

**EDR RECORDS SERVICES, INC.**

**RECORDS PERTAIN TO: Hercules Marine Services Corporation**

**RECORDS FROM: Texas Natural Resource Conservation Commission**

**TYPE OF RECORDS: Investigation Records**

**CAUSE NO.: 96-G0201**

**DELIVER TO:**

**William J. Eggleston  
Taylor & Eggleston  
4800 Three Allen Center 333 Clay Street  
Houston, Texas 77002**

**COPY**

**VOLUME IV  
PAGES 637 TO 871**

2437 Bay Area Blvd., Ste. 228  
Houston, Texas 77058  
(281) 486-5531 • 800-876-3901

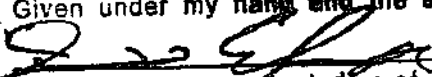


# PART II

STATE OF TEXAS

COUNTY OF TRAVIS

I hereby certify that this is a true and correct copy of a Texas Natural Resource Conservation Commission document, which is filed in the permanent records of the Commission. Given under my hand and the seal of office on

  
Jimmie E. Savage, Custodian of Records  
Texas Natural Resource  
Conservation Commission

000637

ATTACHMENT D

DOCUMENTATION PROVIDED BY BASF CORPORATION ON MAY 7, 1997  
CONCERNING THE MATERIAL IN THE BARGES DELIVERED TO HERCULES TO BE  
CLEANED. THIS INCLUDES ONLY THE DATES WHICH DISAGREE WITH HERCULES  
FILES

(Ms. Suzette Johnson explained the system used in the enclosed files. Any barge which shows either Citgo, Phillips, Koch, Huntsman, or Chevron contain cyclohexane. Also, any barge which is put in for a "strip and blow dry" also contained cyclohexane. Some of the entries specifically identify the cargo as cyclohexane.)

000638

## BASF WEEKEND BARGE SCHEDULE

DATE 07-Feb-97 - 09:52 AM

ETT 110: Loaded (Citgo 1) enroute to Freeport, via Brown Water VII. ETA Freeport 2400. Spot barge at dock upon arrival. Barge will need to be gauged and sampled. Will discharge 0730 Saturday. Take to W/F after discharge is complete. Brown Water VII will take to Corpus to load (Citgo 2). \* Priority 1 / # Priority 3

ETT 112: Loaded (2.8 M lbs. of NBOL) enroute to Stantran, via Brown Water IV. ETA Stantran 1200. Will discharge and return to Freeport. Bring to B-1 Wall on Low tide 0900 Sunday. Spot at dock after the ETT 113 has completed discharging. Barge will need to be gauged and sampled. Will load (2.8 M lbs. of NBOL) 0730 Monday. \* Priority 5

ETT 113: Loaded (Koch 1) enroute to Freeport, via Brown Canal. ETA Freeport 1200 Saturday. Spot barge at dock after the ETT 110 has completed discharging. Barge will need to be gauged and sampled. Will discharge 1200 Sunday. Take to W/F after discharge is complete. Brown Canal will take to Phillips to load (Phillips 2) Monday. \* Priority 3 / # Priority 5

ETT 114: Discharging (Phillips 1) at dock. Take to W/F after discharge is complete. Brown Water IV will take to Corpus to load (Koch 2). # Priority 1

ETT 115: Empty (CPLX) at Hercules having pipeline repaired and cleaned.

CCI 75: Loaded (All Oleum) enroute to Freeport. ETA 2000. Spot at dock after the SCC 108 has completed discharging. Barge will discharge 1200 Sunday. Take to W/F after discharge is complete. Hold for Tug Javalina. \* Priority 4 / # Priority 6

SCC 106: Empty (All Acid) enroute to Rhone-Poulenc. Will load and return to Freeport. Spot at dock after the CCI 75 has completed discharging. Barge will discharge 0730 Monday. \* Priority 6

SCC 80: Empty (All Oleum) at W/F. Hold for Tug Javalina.

SCC 108: Loaded (All Acid) enroute to Freeport. ETA 2000. Spot barge at dock after the SCC 104 has completed discharging. Barge will discharge 0730 Saturday. Take to W/F after discharge is complete. Hold for Tug Javalina. \* Priority 2 / # Priority 4

SCC 104: Discharging (All Oleum) at dock. Take to W/F after discharge is complete. Hold for Tug Javalina. # Priority 2

\* - Priority to dock

# - Priority out to skimmer gate

# - All priority barges taken to dock should go to skimmer gate as soon as possible after work is complete.

For any further information please contact:

Robert G. Peters Office: 238-6161

Suzette Johnson Office: 238-8409

000639

**BASF Corporation**

**BASF**

**BASF BARGE SCHEDULE**

**DATE 10-Feb-97 - 10:22 AM**

**ETT 110:** Empty and clean enroute to Stantran to load (2.8 M lbs. of CPLX), via Brown Canal.

**ETT 112:** Loading (2.8 M lbs. of NBOL) at dock. Take to W/F after loading is complete. Brown Canal will take to Stantran for discharge after they return from loading (CPLX). **# Priority 2**

**ETT 113:** Empty (Cyclohexane) at B-1 Wall. Take to W/F on Low tide 1100 today. Brown Water IV will take to Corpus to load (Citgo 2). **# Priority 1**

**ETT 114:** Loading (Koch 2) at Corpus, via Brown Water VII. Spot barge at dock immediately upon arrival at Freeport.

**ETT 115:** Empty (Clean) at Hercules having gearbox repaired.

**CCI 75:** Empty (All Oleum) at W/F. Hold for Tug Javalina.

**SCC 106:** Loaded (All Acid) enroute to Freeport. ETA 1100 today. Spot at dock upon arrival. Barge will discharge as soon as spotted at dock. Take to W/F after discharge is complete. Hold for Tug Javalina.

**\* Priority 1 / # Priority 3**

**SCC 80:** Loaded (All Oleum) enroute to Freeport. ETA 1100. Spot at dock after the SCC 106 has completed discharging. Barge will discharge 1200 Tuesday. **\* Priority 2**

**SCC 108:** Empty (All Acid) at W/F. Hold for Tug Javalina.

**SCC 104:** Empty (All Oleum) at W/F. Hold for Tug Javalina.

**\* - Priority to dock**

**# - Priority out to skimmer gate**

**# - All priority barges taken to dock should go to skimmer gate as soon as possible after work is complete.**

For any further information please contact:

Robert G. Peters Office: 238-6161

Suzette Johnson Office: 238-8409

**000640**

**BASF Corporation**

**BASF**

**BASF BARGE SCHEDULE**

**DATE 18-Feb-97 - 10:12 AM**

**ETT 110:** Partially loaded (CPLX) at B-1 Wall. Hold until further notice.

**ETT 112:** Empty (Clean) at Hercules for USCG MidTerm and repairs.

**ETT 113:** Discharging (Chevron 1) at dock. Take to W/F after discharge is complete on Low tide 0400

Wednesday. Brown Water IV will take to Phillips to load (Phillips 3) 0800 Thursday.

**# Priority 1**

**ETT 114:** Loaded (Koch 3) enroute to Freeport, via Brown Canal. ETA 1500. Spot at dock after the ETT 113 has completed discharging. Barge will need to be gauged and sampled. Will discharge 1200 Wednesday.

**\* Priority 1**

**ETT 115:** Empty enroute to Hercules for a Strip, & Blow Dry and Nitrogen pad. Brown Water VII will take to Stantran to load (2.8 M lbs. of NBOL) for shipment to Union Carbide. Seadrift.

**CCI 75:** Empty (All Oleum) enroute to Rhone-Poulenc. ETA Houston 1500.

**SCC 106:** Empty (All Acid) enroute to Rhone-Poulenc. ETA Houston 1500.

**SCC 80:** Discharging (All Oleum) at dock. Take to W/F after discharge is complete. Hold for Tug Javalina.

**# Priority 2**

**SCC 108:** Loaded (All Acid) at W/F. Spot at dock after the SCC 80 has completed discharging. Barge will discharge 1200 Wednesday.

**\* Priority 2**

**SCC 104:** Loaded (All Oleum) at Rhone-Poulenc.

**\* - Priority to dock**

**# - Priority out to skimmer gate**

**# - All priority barges taken to dock should go to skimmer gate as soon as possible after work is complete.**

For any further information please contact:

Robert G. Peters Office: 238-6161

Suzette Johnson Office: 238-8409

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## BASF WEEKEND BARGE SCHEDULE

DATE 21-Feb-97 - 11:02 AM

ETT 110: Loading (2.8 M lbs. of CPLX) at Stantran, via Brown Water IV. Spot at dock Sunday after the ETT 112 has completed discharging. Barge will need to be gauged and sampled. Barge will partially discharge 0730 Monday. **\* Priority 4**

ETT 112: Empty (Clean) enroute to Corpus to load (Koch 4), via Brown Canal. ETA Corpus 1200. Spot barge at dock upon arrival at Freeport. Barge will need to be gauged and sampled. Will discharge 0730 Sunday. Take to W/F after discharge is complete on Low tide 0900 Monday. **\* Priority 2 / # Priority 3**

ETT 113: Discharging (Phillips 3) at dock. Take to W/F after discharge is complete on Low tide 0800 Saturday. Take barge to Hercules for preparation for USCG COI Monday. **# Priority 1**

ETT 114: Empty (Cyclohexane) at W/F. Brown Water IV will take to Brown Water VII to take to Corpus to load (Citgo 3).

ETT 115: Discharging (NBOL) at Union Carbide, Seadrift, TX. Will return to Freeport, via Brown Water IV. Hold at W/F after arrival at Freeport.

CCI 75: Loaded (All Oleum) at W/F. Spot at dock after the SCC 106 has completed discharging. Barge will discharge 0730 Sunday. Take to W/F after discharge is complete. Hold for Tug Javalina. **\* Priority 3 / # Priority 4**

SCC 106: Loaded (All Acid) at W/F. Spot at dock today. Barge will discharge 0730 Saturday. Take to W/F after discharge is complete. Hold for Tug Javalina. **\* Priority 1 / # Priority 2**

SCC 80: Empty (All Oleum) enroute to Rhone-Poulenc. ETA Houston 1700.

SCC 108: Empty (All Acid) enroute to Rhone-Poulenc. ETA Houston 1700.

SCC 104: Empty (All Oleum) at W/F. Hold for Tug Javalina.

**\* - Priority to dock**

**# - Priority out to skimmer gate**

**# - All priority barges taken to dock should go to skimmer gate as soon as possible after work is complete.**

For any further information please contact:

Robert G. Peters Office: 238-6161

Suzette Johnson Office: 238-8409

000642



## BASF BARGE SCHEDULE

DATE 24-Feb-97 - 10:00 AM

ETT 110: Partially discharging (CPLX) at dock. Move to B-1 Wall after partial discharge is complete. Hold at B-1 Wall until further notice.

ETT 112: Loaded (Koch 4) enroute to dock. ETA dock 1200. Barge will need to be gauged and sampled. Barge will discharge as soon as spotted at dock. Take to W/F after discharge is complete on Low tide 2200 tonight.

Brown Water VII will take to Corpus to load (Citgo 4).

**\* Priority 1 / # Priority 1**

ETT 113: Empty (Cyclohexane) at Hercules for USCG COI. Brown Canal will take to Corpus after COI has been completed to load (Koch 5).

ETT 114: Loaded (Citgo 3) enroute to Freeport. ETA 2100. Spot at dock after the ETT 112 has completed discharging. Barge will need to be gauged and sampled. Will discharge 0730 Tuesday.

**\* Priority 2**

ETT 115: Empty (NBOL) at W/F. Hold until further notice.

CCI 75: Empty (All Oleum) enroute to Rhone-Poulenc.

SCC 106: Empty (All Acid) enroute to Rhone-Poulenc.

SCC 80: Loaded (All Oleum) at W/F. Hold until further notice.

SCC 108: Loaded (All Acid) at W/F. Spot at dock after the ETT 110 has completed partially discharging (CPLX). Barge will discharge 0730 Tuesday.

**\* Priority 3**

SCC 104: Loading (All Oleum) at Rhone-Poulenc.

**\* - Priority to dock**

**# - Priority out to skimmer gate**

**# - All priority barges taken to dock should go to skimmer gate as soon as possible after work is complete.**

For any further information please contact:

Robert G. Peters Office: 238-6161

Suzette Johnson Office: 238-8409

000643

BASF 02/09/97



2-5396  
ETT 110

BASF  
2-9-97

000644

# HERCULES

MARINE SERVICES CORPORATION

P. O. Drawer O • Freeport, Texas 77541

INVOICE NO. 3702

DATE Feb. 9, 1997

Job No. 2-5396

Location Freeport, TX

TO:

BASF  
602 Copper Road  
Freeport, Texas 77541

PLEASE REMIT PAYMENTS TO:  
11011 RICHMOND  
SUITE 500  
HOUSTON, TX. 77042

Terms : Net 30

FOR:

Service to the ETT 110 as follows:

Strip and Blow. Check engine for oil leakage.  
Located and removed cover with hole, weld hole and  
replace cover.

LABOR:	Leadman	7.5 Hrs.	@	35.00 (ST)	262.50
	Journeyman	28 Hrs.	@	32.50 (ST)	910.00
STOCK:	45.10	Plus 25%		11.28	56.38
EQUIPMENT:	Compressor	5 hrs.	@	48.00	240.00
	Air Movers	20 hrs.	@	5.00	100.00
	Vacuum	3 hrs.	@	30.00	90.00
	Hand Hose	3 hrs.	@	12.00	36.00

TOTAL AMOUNT DUE

\$1,694.88

000645

PHONE: (409) 233-6371

Strength through Experience, Equipment, Know-How

# DAILY TIME LOG

DATE:	2-9-97	CUSTOMER:	BASF
JOB NO:	5396	BARGE:	ETT-110

START TIME 9:00 AM  
2:00 PM

STOP TIME 12:00 PM  
7:00 PM

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
Clarke	7 1/2				
Cross	6 1/2				
Quinten	6 1/2				
Cross	6 1/2				
River	6 1/2				
Joe	2				

## MATERIAL LIST:

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## JOB DESCRIPTION:

Setup and stand-by for Strip & Blow Barge (110).  
 Upon arrival (Strip & Blow Dry)  
 Check for oil leak (oil spill on Deck); located oil hole  
 on sensor plate cover to motor. ~~Not~~ Removed and welded  
 hole on plate. Reinstalled on motor.

35 1/2 hrs

000646



MAINE SERVICES CORPORATION

Strength through environmental awareness and customer service

P.O. Drawer 0  
Freeport, Maine 04725

Office (409) 230-0371  
Fax (409) 230-0375

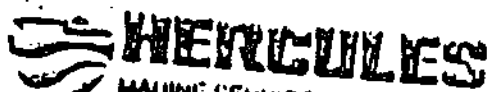
Date 2-9-92 Job No: 2-5396 Name/MV: ETT-110

EQUIPMENT	HOURS
Compressor	
Air Movers	5
Vacuum	20
Steam Rip	3
Hand Haul	
Roller	3
2" Strip Pump	
1" Diesel Pump	
4" Electric Pump	
Crane	
Cherry Picker	
Forklift	
Tug Boat	
Welding Machine	
Cutting Rig	
Work Hauler	
Haul Out	
Truck	
Hand Tools	

STOCK	NUMBER
Coveralls	
Batteries	2
Respirator Filters	2
Gloves	4
Flashlights	2
Gaskets	
Cupples	
Boots	2
Raincoats	
White Rags	

7.10  
4.50  
24.00  
3.50  
6.00

000647



MAINE SERVICES CORPORATION

Strength through environmental awareness and customer service

P.O. Drawer O  
Freeport, Texas 77541

Office (409) 233-0371  
Fax (409) 233-0375

Date: 12-9-92 Job No: 2-5396 Name: MV: ETT-110

EQUIPMENT	HOURS
Compressor	
Air Movers	5
Vacuum	20
Steam Rig	3
Hand Haul	
Roller	3
2" Strip Pump	
3" Diesel Pump	
4" Electric Pump	
Crane	
Cherry Picker	
Forklift	
Tug Boat	
Welding Machine	
Cutting Rig	
Work Hauler	
Haul Out	
Truck	
Hand Tools	

STOCK	NUMBER
Coveralls	2
Batteries	2
Respirator Filters	4
Gloves	2
Flashlights	
Gaskets	
Couplers	
Boats	2
Raincoats	
White Rags	

000648

# Job Workscope/Breakdown

Job No: 2-5396 Date: 2-9-97 Invoice Number: 3762

Customer: BAF Barge/MAN: Ett 110

Travel Time: \_\_\_\_\_ Hours @ 17.50/Hour  
Mileage : \_\_\_\_\_ Miles @ 0.25/Mile  
Foreman: ST \_\_\_\_\_ @ 38.00

O/T \_\_\_\_\_ @ 53.25

Leadman: ST 7 1/2 @ 35.00 262.50

O/T \_\_\_\_\_ @ 49.50

Journeyman: ST 28 @ 32.50 910.00

O/T \_\_\_\_\_ @ 45.75

Disposal: Slop Oil \_\_\_\_\_ @ 0.60

Water \_\_\_\_\_ @ 0.35

Water: \_\_\_\_\_ @ 5.00/1,000 gal

Material: \_\_\_\_\_ Plus 25% \_\_\_\_\_

Stock: 45.10 Plus 25% 11.28 56.38

Chemist: \_\_\_\_\_ Plus 25% \_\_\_\_\_

Equipment: Compressor 5 @ 48.00 240.00

Air Movers 20 @ 5.00 100.00

Forklift \_\_\_\_\_ @ 30.00

Tugboat \_\_\_\_\_ @ 100.00

Steam Rig \_\_\_\_\_ @ 100.00

Vacuum 3 @ 30.00 90.00

Hand Hose 3 @ 12.00 36.00

Weld Machine \_\_\_\_\_ @ 15.00

Cherry Picker \_\_\_\_\_ @ 70.00

Crane \_\_\_\_\_ @ 130.00

3" Gas Pump \_\_\_\_\_ @ 18.00

2" Strip Pump \_\_\_\_\_ @ 15.00

Butterworth \_\_\_\_\_ @ 10.00

4" Elec. Pump \_\_\_\_\_ @ 15.00

Cutting Rig \_\_\_\_\_ @ 8.00

Haul Out \_\_\_\_\_ @ 1,100.00

Truck \_\_\_\_\_ @ 25.00

Hand Tools \_\_\_\_\_ @ 10.00

## MATERIAL COST:

Overalls - 3.55 Ea.  
Batteries - 2.25 Ea.  
Respirator Fil- 6.00 Ea.  
Gloves - 1.75 Ea.  
Flashlights - 12.00 Ea.  
Gaskets - 6.00 Ea.  
Goggles - 2.95 Ea.  
Boots - 9.00 Ea.  
Raincoats - 36.65 Ea.  
White Rags - 9.93/Box  
Cleaner - 72.75

Cost + 25% Charge to Customer.

Total Invoice:

8,694.88

000649



BASF 02/09/97

— 2-5396  
ETT 110

BASF  
2-9-97

000650

# HERCULES OFFSHORE CO.

## MARINE REPAIR

MARINE OPERATIONS FACILITY

INVOICE NO. 3762

ORDER No. 2-5396

CUSTOMER P.O. \_\_\_\_\_

DATE	ORDER NUMBER	ETA
	<u>2-9-97</u>	<u>10:00 a.m.</u>
	APPROVAL	
	COMPLETION DATE	
	DEPARTURE DATE	
	WTS <input type="checkbox"/> TANKS <input checked="" type="checkbox"/> <u>XX</u>	
	NAME <u>ETT 110</u>	
	LOG	
	PROGRAM	
	<u>C. DUARTE</u>	
	LAST PRODUCT	
	GAS FREEING YES <input type="checkbox"/> NO <input type="checkbox"/> CERTIFICATE REQUIRED YES <input type="checkbox"/> NO <input type="checkbox"/>	
	HAUL OUT FOR INSPECTION AND REPAIR YES <input type="checkbox"/> NO <input type="checkbox"/>	
	ON WAYS DATE: _____	
	ON WAYS DATE: _____	

CUSTOMER	NAME	
	<u>BASF</u>	
	BILLING ADDRESS	
	CITY AND STATE	
	<u>FREEPORT, TX 77541</u>	
	PHONE NUMBER	
	DATE RECEIVED BY	BY RECEIVED BY
	<u>R. PETERS</u>	
	STOCK MATERIAL	<input type="checkbox"/> YES <input type="checkbox"/> NO
	IF YES, COMPLETE STOCK MATERIAL TRANSFER TICKET	
	OUTSIDE SERVICES	<input type="checkbox"/> YES <input type="checkbox"/> NO
	IF YES, LIST	

### ITEM NUMBERS

1 STRIP AND BLOW. CHECK ENGINE FOR OIL LEAKAGE.

2

3

4

5

6

7

8

9

10

THIS SHALL SERVE AS YOUR AUTHORIZATION TO PROCEED WITH THE ABOVE.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

000651

# HERCULES OFFSHORE CO.

MAR. REPAIR

MARINE OPERATIO. ACILITY

INVOICE NO. \_\_\_\_\_

ORDER No. 2-5396

CUSTOMER P.O. \_\_\_\_\_

DATE	ORDER DATED	2-9-97	ETA	10:00 a.m.
	APPROVAL			
	COMPLETION DATE			
	DEPARTURE DATE			
D/V <input type="checkbox"/> BASED <input checked="" type="checkbox"/> XX ETT 110				
NAME LOG				
FOURMAN				
C. DUARTE				
LAST POSITION				
GAS PRESSING YES <input type="checkbox"/> NO <input type="checkbox"/> CERTIFICATE REQUIRED YES <input type="checkbox"/> NO <input type="checkbox"/>				
HAUL OUT FOR INSPECTION AND REPAIR YES <input type="checkbox"/> NO <input type="checkbox"/>				
ON WAYS DATE: _____				
ON WAYS DATE: _____				

CUSTOMER	NAME	BASF
	ADDRESS	
	CITY AND STATE	FREEPORT, TX 77541
	PHONE NUMBER	
ORDER COMPLETED BY		R. PETERS
STOCK MATERIAL		<input type="checkbox"/> YES <input type="checkbox"/> NO
IF YES, COMPLETE STOCK MATERIAL TRANSFER TICKET		
OUTSIDE SERVICES		<input type="checkbox"/> YES <input type="checkbox"/> NO
IF YES, LIST		

## ITEM NUMBERS

1 STRIP AND BLOW. CHECK ENGINE FOR OIL LEAKAGE.

2 *Locate and remove cover with hole, weld hole & replace cover.*

3

4

5

6

7

8

9

10

THIS SHALL SERVE AS YOUR AUTHORIZATION TO PROCEED WITH THE ABOVE.

Signed: *Claudio P. P. P.*

Date: 2-9-97

000652

JOS NO. \_\_\_\_\_

## BARGE CLEANING REPORT

BARGE NO. EFT2110COUNTRY BASEPRODUCT N-BUTANOL

ETA \_\_\_\_\_

DATE/TIME ARRIVAL 2-9-97 2:20DATE/TIME STARTED 2-9-97 2:20DATE/TIME COMPLETED 2-9-97 7:00CLEANING INSTRUCTION BY: Robert PetrusAMOUNT STRIPPED 300

COMPLETION SCHEDULE BY: \_\_\_\_\_

OVERTIME AUTHORIZED BY: Robert PetrusBARGE INSPECTED BY: DuarteBARGE RELEASED TO: Brown Water IVDATE/TIME: 6:00 PMDATE/TIME: 6:45 PMDEEPWELL OPENED: YES N/A NO \_\_\_\_\_

NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_

BELOW DECK CARGO PIPELINE: BLIND OPEN YES \_\_\_\_\_ NO \_\_\_\_\_

CLOSED BY Robert Petrus CASSET YES \_\_\_\_\_ NO \_\_\_\_\_DECK CHECK VALVE OPENED: YES N/A NO \_\_\_\_\_

CLOSED BY \_\_\_\_\_ NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_

DECK HEADER BLINDS OPEN: YES

INSPECTED BY CALED BRETT

DECK HEADER BRAKE PLUG OPEN: YES N/A NO \_\_\_\_\_CLOSED BY CHSVAPOR RECOVERY HEADER OPENED: YES N/A NO \_\_\_\_\_CLOSED BY CASH NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_RUST SCALE: YES N/A NO \_\_\_\_\_

WASHED OUT \_\_\_\_\_ BUCKETED OUT \_\_\_\_\_

NUMBER OF CARGO TANKS 3CONDITION OF CARGO VALVES GoodSLOP TANK STRIPPED: YES N/A NO \_\_\_\_\_DRIP PANS STRIPPED: YES N/A NO \_\_\_\_\_WEATHER: TEMP 60 RAIN \_\_\_\_\_ FOG \_\_\_\_\_ HUMIDITY \_\_\_\_\_OVERCAST N/A CLOUDY N/A CLEAR \_\_\_\_\_PIPELINE WASHED: NO PIPELINE BLOWN YES

INSPECTED BY CALED BRETT

BOW RACE CHECKED: YES N/A NO \_\_\_\_\_

STERN RACE: YES \_\_\_\_\_ NO \_\_\_\_\_

VOIDS: YES N/A NO \_\_\_\_\_

SAFETY EQUIPMENT USED: \_\_\_\_\_

SUMP TANKS \_\_\_\_\_

## NOTICE

All barges cleaned for BASF will be inspected by Caleb Brett. The inspector will have paperwork for the Mercator Foreman in charge to sign. The foreman will put two copies in the document mail box. One copy will stay in the mailbox, and the captain of the tugboat that is picking up the barge will not be called until inspection is completed and documentation is in the mailbox. If any problems, BASF logistics representative must be contacted.

Inspected 2/9/97

1835

1900

Inspected By A. Dwyer

Time Out

NO BASF BARGE THAT HAS BEEN CLEANED WILL BE RELEASED UNTIL CALED BRETT INSPECTION IS COMPLETED. CALED BRETT WILL BE GIVEN A COPY OF THIS FORM.

000653





Inchcape Testing Services  
Caleb Brett

## VISUAL TANK INSPECTION REPORT

YOUR REFERENCE
OUR REFERENCE

000655

VEHICLE	PRODUCT / CARGO	PORT / TERMINAL	DATE
ET-110	N/A	HARCURS	2-9-97
Tank Number	1,2,3c		
Tank Coating	N/A		
Last Cargo	ink		
Second Last Cargo	↓		
Third Last Cargo			
Time/Date Inspected	2-9-97 / RSO		
Visual Cleanliness Accepted/Rejected*	Accepted		
Reason for Rejection	N/A		

Method said to  
have been used  
clean tanks:

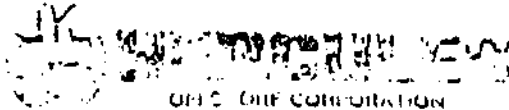
TK#	Strip + blow
TK#	Stripped product from cargo lines - blow dry for 3 hours
TK#	Stripped product from cargo tanks & blow dry for 1 1/2 hours
TK#	
TK#	
TK#	
TK#	

Information regarding previous cargoes, tank coating and cleaning method was obtained from vessel personnel and cannot be guaranteed as accurate by Caleb Brett. No liability can be assumed for errors resulting from improper information supplied. This report, of necessity, is based on such information.

The cleanliness of inspected tank(s) is/are based on visual inspection of tank surfaces and line system at accessible areas only. This document does not cover cleanliness of tank surfaces and line system at inaccessible spots and/or possible release of components of previous cargoes during loading, discharge or port of the cargo in question, for which the vessel is fully responsible. Suitability of tank coating for intended cargo must be guaranteed by vessel's owner/suppliers of the coating.

*[Signature]*

FOR CALEB BRETT



Strength through experience, equipment, know-how  
P.O. Drawer 3 Office: (409) 235-6371  
Freeport, Texas 77541 Fax: (409) 235-6375

### FINAL CHECK LIST

DATE: 2-9-97

BARGE: ETT-110

NUMBER CHECKED 2 REPLACED GASKET YES NO  
GATE VALVE NUMBER CHECKED 5 REPLACED GASKET YES NO  
PLUGS NUMBER CHECKED N/A REPLACED PLUG YES NO  
CHECK VALVE NUMBER CHECKED N/A REPLACED GASKET YES NO  
DEEPWELL BLIND NUMBER CHECKED N/A REPLACED GASKET YES NO  
BLOW DECK CARGO PIPELINE BLIND NUMBER 2 REPLACED GASKET YES NO  
BLOW DECK CARGO PIPELINE BLIND REMOVED YES NO  
PAN VALVES: CLOSED BY CRVZ  
DRIP PAN COVER: CLOSED BY N/A  
CONTAINMENT AREA PLUG OR VALVES: CLOSED BY N/A

AIR TEST CARGO LINE - 40psi - USING SOAP

SIGNATURE OF TESTER: Charles Duarte

WITNESS: Luigi L. Quiroga

CHECK VALVE GASKET WILL BE REPLACED

AIR TEST IS LAST THING TO BE DONE BEFORE REPLACING GASKET.

000656



## \* Rules and Regulations for Tank Vessels

# HAZARDOUS COMMUNICATION STANDARD

OSHA 1910.1200

## EMPLOYEE HAZARDOUS MATERIALS TRAINING PROGRAM

Date 2-9-92

Plant Hercules

Area BASELINE DOCK  
ETTE 110

Supervisor Charles Smith

Client Safety                     

The following listed materials are considered to be hazardous to the employee working in this area:

M. BUTANOL

The employees assigned to work in this area have been informed of the hazardous materials in this area, the hazards they present to the workers, the location of hazards listed, the protective equipment that has been provided and where it is located, and procedures to be followed in case of an accidental exposure. I have received the training listed above and will so designate by signing this form.

NAME	BADGE	NAME	BADGE
<u>Jose A Casas</u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>

000658

# EMERGENCY RESPONSE INFORMATION SHEET

C. 12912

N-BUTANOL

FLAMMABLE  
DOT LIQUID  
NA1120

FORM: LIQUID, CLEAR  
SPECIFIC GRAVITY: 0.8  
SOLUBILITY IN WATER: MIXES SLIGHTLY  
FREEZING POINT: -128°F  
BOILING POINT: 243.9°F  
FLASH POINT: 97°F (TOC)

FLAMMABLE LIMITS: 1.4% - 11.2%  
VAPOR HAZARD: FLAMMABLE.  
IRRITATING.  
REACTS WITH: OXIDIZING MATERIALS,  
COPPER AND ITS ALLOYS.

## HEALTH HAZARDS

ANIMAL: AVOID INGESTION. AVOID EXPOSURE.  
FISH: AVOID ENTRY INTO NATURAL WATERS. MAY CAUSE LOCALIZED FISH KILL.  
EYES: MODERATE BURN. MODERATE IRRITATION.  
SKIN: MODERATE IRRITATION; TOXIC BY ABSORPTION UPON CROSS CONTACT.  
INHALATION: SLIGHTLY IRRITATING. DROWSINESS, UNCONSCIOUSNESS.  
INGESTION: LOW TOXICITY.

## IN CASE OF ACCIDENT

LEAK

FLAMMABLE. IRRITATING. KEEP UPWIND. ISOLATE AREA AND DENY ENTRY.  
DO NOT GET IN EYES. AVOID CONTACT WITH SKIN. AVOID BREATHING VAPORS.  
USE WATER SPRAY TO REDUCE VAPOR. NO SMOKING, FLARES, OR OPEN FLAMES.  
SHUT OFF IGNITION AND LEAK IF WITHOUT RISK. USE NONCOMBUSTIBLE ABSORBENT  
MATERIAL/SAND AND SHOVEL INTO SUITABLE CONTAINERS.  
DIKE LARGER SPILLS AND RECOVER. AVOID ENTRY INTO SEWERS AND/OR NATURAL  
WATERS.  
CLOTHING: WEAR FULL PROTECTIVE CLOTHING AND SELF-CONTAINED BREATHING  
APPARATUS.  
DISPOSAL: CONTACT MANUFACTURER AND AUTHORITIES.

FIRE

FLAMMABLE. IRRITATING.  
DO NOT PUT OUT ANY FIRES AT VENTS UNTIL LEAK IS SHUT OFF.  
MAY DECOMPOSE IN HEAT/FIRE RELEASING PRODUCTS OF GREATER HAZARD.  
COOL CONTAINERS EXPOSED TO HEAT/FIRE WITH WATER TO PREVENT BURSTING.  
SMALL FIRES: USE DRY CHEMICAL OR CO<sub>2</sub>.  
LARGE FIRES: USE WATER SPRAY, FOG, OR ALCOHOL FOAM. IF MASSIVE FIRE:  
USE UNMANNED HOSE HOLDER OR MONITOR NOZZLES. IF THIS IS IMPOSSIBLE,  
WITHDRAW FROM AREA AND LET FIRE BURN. DIKE LIQUID RUN-OFF.  
AVOID ENTRY INTO SEWERS AND/OR NATURAL WATERS.

AID

EYES: IRRIGATE WITH FLOWING WATER IMMEDIATELY AND CONTINUOUSLY FOR 15  
MINUTES. CONSULT MEDICAL PERSONNEL.  
SKIN: IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES  
WHILE REMOVING CONTAMINATED CLOTHING. CONSULT MEDICAL PERSONNEL.  
CLOTHING: REMOVE CONTAMINATED CLOTHING IMMEDIATELY AND WASH BEFORE  
REUSE. DESTROY CONTAMINATED SHOES AND LEATHER ITEMS.  
INHALATION: REMOVE TO FRESH AIR IF EFFECTS OCCUR. CONSULT MEDICAL  
PERSONNEL.

000659

The information contained herein is hereby presented as a complimentary act in good faith, and is, to the best of The Dow Chemical Company's knowledge and belief, accurate and reliable as the data compiled, but may still be incomplete. No representation, guarantee or warranty is made as to its accuracy, reliability or completeness and, as Governmental regulations and other conditions change, the user's responsibility in securing the current appropriateness and suitability for specific end uses prior to use.

DOW CHEMICAL U.S.A.

R-04-01-81

BASF 02/18/97

2-5402  
ETT 115

BASF  
2-18-97

000660

# UCISCO, INC.

A PRAXAIR SERVICE COMPANY

THE PLAZA AT COMMERCE PARK NORTH  
 FENNIBRIGHT, SUITE 300  
 HOUSTON, TEXAS 77090-5999 (713) 872-2229

## SERVICE AGREEMENT

No. 46251

<b>BILLING INFORMATION</b>	Customer <u>BASE</u>	Customer Code <u>1310-</u>
	Address <u>602 COPPER RD AITN: AP</u>	
	City <u>FREEPORT</u> State <u>TX</u> Zip <u>77541</u>	Phone _____
	P.O. No. _____	Tax Exempt No. _____
<b>JOB LOCATION</b>	City <u>FREEPORT</u> County <u>BLAZORIA</u> State <u>TX</u> Zip _____	Tax Code _____
<b>DISPATCH INFORMATION</b>	Time & Date Needed <u>0000 02/19/97</u>	District <u>1310</u>
	Rate Sch. <input type="checkbox"/> Quotation <input type="checkbox"/> No. _____	No Service <input type="checkbox"/>
	Description of Service <u>PURGE A BARGE @ THE HERULEWS MARINE TERMINAL</u>	
	Market Served <u>G</u> <input checked="" type="checkbox"/> NPS <input type="checkbox"/> PCSFT <input type="checkbox"/> PCSPL <input type="checkbox"/> PCSHX <input type="checkbox"/> TT <input type="checkbox"/> Other _____	
<b>WARNING</b>	1. PRE-JOB DISCUSSION WAS HELD & SAFETY CHECK LIST COMPLETED. <u>MCE</u> Initial 2. CUSTOMER HAS RECEIVED A COPY OF SAFETY PRECAUTIONS. <u>MCE</u> Initial	

**HAZARDOUS** ☐ YES ☒ NO **ORIGIN** (PROCESS) \_\_\_\_\_ **IDENTITY/DESCRIPTION** \_\_\_\_\_ **CHEMICAL CONSTITUENTS** \_\_\_\_\_ **DISPOSAL SITE/ DISPOSITION** \_\_\_\_\_

The undersigned acknowledges that the information provided above with respect to Wastes (as defined in paragraph 9 of the terms and conditions specified on the reverse side hereof) represents the best knowledge of the Customer with respect to such Wastes. The undersigned further acknowledges that a pre-job discussion was held, a safety check list was completed, and that he has received and read the safety precautions and hereby approves, accepts and authorizes the services described herein to be performed in accordance with the terms and conditions specified on the reverse side of this service agreement. Unless prices are quoted, all prices will be according to UCISCO's rate schedule in effect at the time of the services.

**AUTHORIZED SIGNATURE** Roger S. Peltz **TITLE** Operator **DATE** 2/19/97

EQUIPMENT	UNIT 1	TYPE	UNIT 2	TYPE
Unit No. & Type	2148	23-A		
Date & Time Out	02/18/97	1800		
Date & Time On Site	02/19/97	0000		
Date & Time Started	02/19/97	0000		
Date & Time Completed	02/19/97	0300		
Date & Time In				
TOTAL N <sub>2</sub> UNIT HOURS	3			
SANDJET RUNS				
Additional Sandjet Runs				
Additional Hours				
Additional Days				
TOTAL N <sub>2</sub> USED (NPS ONLY)				
EQUIPMENT MILEAGE				
Roundtrip Miles From:	LA PORTE, TX			
Allowed Miles Per N <sub>2</sub> Unit				
Chargeable Miles	230	x No. of Units 1		
TOTAL CHARGEABLE MILES				

**THIS AREA IS FOR UCISCO ACCOUNTING USE ONLY**

<b>TRANSPORT MILEAGE AND TIME</b>		<b>ADDITIONAL WORK</b>	
Roundtrip Miles From:		The undersigned authorizes UCISCO to perform the additional services described here at the "additional charges" price contained in UCISCO's quotation or the price specified. A. Description of additional service _____	
Allowed Miles Per Transport		B. Price for additional services <input type="checkbox"/> Quotation <input type="checkbox"/> Other: (Describe) _____	
Chargeable Miles	x No. of Transports		
TOTAL CHARGEABLE MILES			
Total Transport Time On Site			
Total Chargeable Transport Time			
I hereby acknowledge that the above information is correct and the services have been completed.		Customer Signature _____ Date _____	
Authorized Signature <u>Roger S. Peltz</u>		REMARKS <u>Down TIME FROM 0000 - 0130</u>	
Title <u>Operator</u> Date <u>2/19/97</u>			
UCISCO Representative <u>Muel Leg</u>		000661	



P.O. Drawer 0  
Freeport, Texas 77541

Office: (409) 233-6371  
Fax: (409) 233-6375

### FINAL CHECK LIST

DATE: 2-18-87

TARGE: ETT-115

NUMBER CHECKED 2 REPLACED CASKET YES ☐ NO ☐  
GATE VALVE NUMBER CHECKED 6 REPLACED CASKET YES ☐ NO ☐  
PLUGS NUMBER CHECKED 1 REPLACED PLUG YES ☐ NO ☐  
CHECK VALVE NUMBER CHECKED N/A REPLACED CASKET YES ☐ NO ☐  
DEEPWELL BLIND NUMBER CHECKED N/A REPLACED CASKET YES ☐ NO ☐

BLOW DECK CARGO PIPELINE BLIND NUMBER N/A REPLACED CASKET YES ☐ NO ☐

BLOW DECK CARGO PIPELINE BLIND REMOVED YES ☒ NO ☐

TOP PANS VALVES: CLOSED BY CHS 45

TRIP PANS COVER: CLOSED BY N/A

CONTAINMENT AREA PLUG OR VALVES: CLOSED BY N/A

AIR TEST CARGO LINE - 40psd - USING SOAP

SIGNATURE OF TESTER: Charles D. Dwyer

WITNESS: Logan Cave

CHECK VALVE CASKET WILL BE REPLACED

AIR TEST IS LAST THING TO BE DONE BEFORE RELEASING CARGO.

000662

# DECLARATION OF INSPECTION PRIOR TO BULK CARGO TRANSFER

## VESSELS

BASF

ETT-115

## TRANSFER FACILITY

HOLY CULCS MARINE GAS FILL DOCK

## LOCATION

FREEPORT TX.

The following list refers to requirements set forth in detail in 33 CFR 158.150 and 48 CFR 26.35-30 (printed on reverse). The space adjacent to items on the list are provided to indicate that the detailed requirements have been met.

1. Communication System/Language Fluency (158.120 (m) (p))
2. Warning Signs and red Warning Signals. (38.35-30)
3. Vessel Mooring. (158.120 (e))
4. Transfer System Alignment (158.120 (d))
5. Transfer System; unused components. (158.120 (a))
6. Transfer Systems; fixed piping. (158.120 (f))
7. Overboard Discharges/Sea Suction Valves. (158.120 (g))
8. House or Loading Arms condition. (158.120 (h) (158.170))
9. Hoses; length and support. (158.120 (b) (c))
10. Coamings. (158.120)
11. Discharge Containment Systems. (158.120 (j) (k))
12. Scuppers or Drains. (158.120 (k))
13. Emergency Shutdown. (158.120 (b))
14. Repair Work /Maintenance. (38.35-30)
15. Boiler and Galley Fire Safety. (38.35-30)
16. Fire or Ozone Hazards (38.35-30)
17. Lighting (except to surface). (158.120 (l))
18. Safe Smoking Areas. (38.35-30)
19. Spill and Emergency shutdown procedures. (158.120 (c))
20. Sufficient Personnel. (158.120 (a) (a))
21. Transfer Conference. (158.120 (q))
22. Agreement to begin transfer. (158.120 (r))

DELIVERER	RECEIVER
/	/
/	/
/	/
/	/
/	/
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/	/
/	/
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N/A	N/A
N/A	N/A
N/A	N/A
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/	/

I do certify that I have personally inspected this facility or vessel with reference to the requirements printed on reverse and that opposite each of them I have indicated that the regulations have been complied with.

Person in Charge Receiving Unit

Charles Smith

TITLE

FOREMAN

TIME &amp; DATE

2-18-97 11:00 AM

Person in Charge Delivering Unit

Charles Smith

FUEL PERSON

000663

TIME COMPLETED 2-18-97 5:30

• Rules and Regulations for Tank Vessels



# BARGE CLEANING REPORT

JOB NO. 5402  
 BARGE NO. ET-115  
 CONTRACT BASF  
 PRODUCT N-BUTANOL

ETA \_\_\_\_\_  
 DATE/TIME ARRIVAL 2-18-97 10:00  
 DATE/TIME STARTED 2-18-97 11:00  
 DATE/TIME COMPLETE 2-18-97 11:00

AMOUNT STRIPPED 300

CLEANING INSTRUCTION BY: Robert Peters

COMPLETION SCHEDULE BY: \_\_\_\_\_

OVERTIME AUTHORIZED BY: \_\_\_\_\_

BARGE INSPECTED BY: Robert Peters

DATE/TIME: 3:30

BOUGE RELEASED TO: Brown Water VN

DATE/TIME: 5:30

DEEPWELL OPENED: YES N/A NO \_\_\_\_\_ CLOSED BY \_\_\_\_\_ NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_

BELOW DECK CARDO PIPELINE: BLIND OPEN YES ✓ NO \_\_\_\_\_ CLOSED BY Cruz NEW CASSET YES ✓ NO \_\_\_\_\_

DECK CHECK VALVE OPENED: YES N/A NO \_\_\_\_\_ CLOSED BY \_\_\_\_\_ NEW CASSET YES ✓ NO \_\_\_\_\_

DECK HEADER BLINDS OPEN: yes INSPECTED BY CALEB BRETT

DECK HEADER DRAIN PLUG OPEN: YES ✓ NO \_\_\_\_\_ CLOSED BY Cruz

VAPOR RECOVERY HEADER OPENED: YES ✓ NO \_\_\_\_\_ CLOSED BY Cruz NEW CASSET \_\_\_\_\_

RUST SCALE: YES \_\_\_\_\_ NO ✓ WASHED OUT \_\_\_\_\_ BUCKETED OUT \_\_\_\_\_

NUMBER OF CARCO TANKS 3

CONDITION OF CARCO VALVES Good

SLOP TANK STRIPPED: YES N/A NO \_\_\_\_\_

DRIP PANS EQUIPPED: YES ✓ NO \_\_\_\_\_

WEATHER: TEMP 70 RAIN \_\_\_\_\_ FOG \_\_\_\_\_ HUMIDITY \_\_\_\_\_ OVERCAST \_\_\_\_\_ CLOUDY ✓ CLEAR ✓

PIPELINE WASHED: yes PIPELINE BLOWN yes INSPECTED BY CALEB BRETT

BOW RAKE CHECKED: YES ✓ NO \_\_\_\_\_ STERN RAKE: YES ✓ NO \_\_\_\_\_

VOIDS: YES ✓ NO \_\_\_\_\_ SAFETY EQUIPMENT USED: \_\_\_\_\_

SUMMARY: \_\_\_\_\_

## NOTICE

All barges cleaned for BASF will be inspected by Caleb Brett. The inspector will have paperwork for the Hercules foreman in charge to sign. The foreman will put two copies in the document mail box. One copy will stay in the mailbox, and the captain of the tugboat that is picking up the barge will not be called until inspection is completed and documentation is in the mailbox. If any problems, BASF logistics representative must be contacted.

Inspected 18 FEB 97

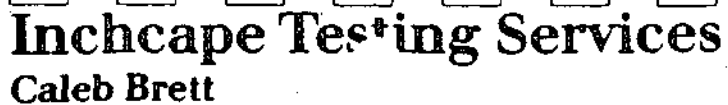
1530

1555

Inspected By [Signature]

000664

NO BASF BARGE THAT HAS BEEN CLEANED WILL BE RELEASED UNTIL CALEB BRETT INSPECTION AND RELEASE PAPERS. CALEB BRETT WILL BE GIVEN A COPY OF THIS REPORT.



## OUR APPEARANCE

CONFIDENTIAL  
FP/97

VESSEL ETT-115	PRODUCT/CARGO VISUAL	PORT/TERMINAL HERCULES/F.P	DATE 02-18-97
-------------------	-------------------------	-------------------------------	------------------

[illegible]

For Vessel *Lucia for Honduras.*

*[Signature]*  
FOR CALED BRETT U.S.A., INC.



message testing services

Caleb Brett

# VISUAL TANK INSPECTION REPORT

OUR REFERENCE

FP197-

VESSEL	ETT - 115	PRODUCT / CARGO	VISUAL	PORT / TERMINAL	HERCULES (F.P.)	DATE	18 FEB 97	000600	
Tank Number	1C	2C	3C						
Tank Coating	SOFT STEEL	SOFT STEEL	SOFT STEEL						
Last Cargo	NORMAL BUTNOL	NORMAL BUTNOL	NORMAL BUTNOL						
Second Last Cargo	N/A	N/A	N/A						
Third Last Cargo	N/A	N/A	N/A						
Time/Date Inspected	1545 18 FEB 97	1545 18 FEB 97	1545 18 FEB 97						
Visual Cleanliness Accepted/Rejected*	ACCEPTED	ACCEPTED	ACCEPTED						
Reason for Rejection									

Method said to have been used to clean tanks:	TK# 1C	STRIPPED CARGO TANKS + PIPELINES (1 hr); VENT OUT FOR (4 hr)
	TK# 2C	BLOW CARGO TANKS + PIPE LINES (2 hr)
	TK# 3C	*NOTE* ALL TANKS AND PIPELINES RECEIVED THE SAME PROCEDURES.
	TK#	
	TK#	
	TK#	

Information regarding previous cargoes, tank coating and cleaning method was obtained from vessel personnel and cannot be guaranteed as accurate by Caleb Brett and no liability can be assumed for errors resulting from improper information supplied. This report, of necessity, is based on such information.

\* The cleanliness of inspected tank(s) is/are based on visual inspection of tank surfaces and line system at accessible areas only. This document does not cover the cleanliness of tank surfaces and line system at inaccessible spots and/or possible release of components of previous cargoes during loading, discharge or transport of the cargo in question, for which the vessel is fully responsible. Suitability of tank coating for intended cargo must be guaranteed by vessel's owner or by suppliers of the coating.

*Samuel L. Nash*  
FOR CALEB BRETT

FOR CALEB BRETT

## HAZARD COMMUNICATION STANDARD

OSHA 1910.1200

## EMPLOYEE HAZARDOUS MATERIALS TRAINING PROGRAM

Date 2-18-87Supervisor Charles SmithPlant HerculesClient Safety                     Area SPMS Free DockE+T-115

The following listed materials are considered to be hazardous to the employee working in this area:

<u>M-BUTANOL</u>		

The employees assigned to work in this area have been informed of the hazardous materials in this area, the hazards they present to the workers, the location of hazards listed, the protective equipment that has been provided and where it is located, and procedures to be followed in case of an accidental exposure.

I have received the training listed above and will so designate by signing this form.

NAME	BADGE	NAME	BADGE
<u>James J. Quintero</u>			
<u>Jose A. Cezar</u>			
<u>David Guy</u>			
<u>[Signature]</u>			

000667

## EMERGENCY RESPONSE INFORMATION SHEET

FLAMMABLE

DOT: LIQUID

NA1120

C. 12912

N-BUTANOL

FORM: LIQUID, CLEAR  
 SPECIFIC GRAVITY: 0.8  
 SOLUBILITY IN WATER: MIXES SLIGHTLY  
 FREEZING POINT: -128°F  
 BOILING POINT: 243.9°F  
 FLASH POINT: 97°F (TOC)

FLAMMABLE LIMITS: 1.4% - 11.2%  
 VAPOR HAZARD: FLAMMABLE.  
 IRRITATING.  
 REACTS WITH: OXIDIZING MATERIALS,  
 COPPER AND ITS ALLOYS.

## HEALTH HAZARDS

ANIMAL: AVOID INGESTION. AVOID EXPOSURE.  
 FISH: AVOID ENTRY INTO NATURAL WATERS. MAY CAUSE LOCALIZED FISH KILL.  
 EYES: MODERATE BURN. MODERATE IRRITATION.  
 SKIN: MODERATE IRRITATION; TOXIC BY ABSORPTION UPON GROSS CONTACT.  
 INHALATION: SLIGHTLY IRRITATING. DROWSINESS, UNCONSCIOUSNESS.  
 INGESTION: LOW TOXICITY.

## IN CASE OF ACCIDENT

SPILL

FLAMMABLE. IRRITATING. KEEP UPWIND. ISOLATE AREA AND DENY ENTRY.  
 DO NOT GET IN EYES. AVOID CONTACT WITH SKIN. AVOID BREATHING VAPORS.  
 USE WATER SPRAY TO REDUCE VAPOR. NO SMOKING, FLARES, OR OPEN FLAMES.  
 SHUT OFF IGNITION AND LEAK IF WITHOUT RISK. USE NONCOMBUSTIBLE ABSORBENT  
 MATERIAL/SAND AND SHOVEL INTO SUITABLE CONTAINERS.  
 DIKE LARGER SPILLS AND RECOVER. AVOID ENTRY INTO SEWERS AND/OR NATURAL  
 WATERS.  
 CLOTHING: WEAR FULL PROTECTIVE CLOTHING AND SELF-CONTAINED BREATHING  
 APPARATUS.  
 DISPOSAL: CONTACT MANUFACTURER AND AUTHORITIES

FIRE

FLAMMABLE. IRRITATING.  
 DO NOT PUT OUT ANY FIRES AT VENTS UNTIL LEAK IS SHUT OFF.  
 MAY DECOMPOSE IN HEAT/FIRE RELEASING PRODUCTS OF GREATER HAZARD.  
 COOL CONTAINERS EXPOSED TO HEAT/FIRE WITH WATER TO PREVENT BURSTING.  
 SMALL FIRES: USE DRY CHEMICAL OR CO<sub>2</sub>.  
 LARGE FIRES: USE WATER SPRAY, FOG, OR ALCOHOL FOAM. IF MASSIVE FIRE:  
 USE UNMANNED HOSE HOLDER OR MONITOR NOZZLES. IF THIS IS IMPOSSIBLE,  
 WITHDRAW FROM AREA AND LET FIRE BURN. DIKE LIQUID RUN-OFF.  
 AVOID ENTRY INTO SEWERS AND/OR NATURAL WATERS.

FIRST

EYES: IRRIGATE WITH FLOWING WATER IMMEDIATELY AND CONTINUOUSLY FOR 15  
 MINUTES. CONSULT MEDICAL PERSONNEL.  
 SKIN: IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES  
 WHILE REMOVING CONTAMINATED CLOTHING. CONSULT MEDICAL PERSONNEL.  
 CLOTHING: REMOVE CONTAMINATED CLOTHING IMMEDIATELY AND WASH BEFORE  
 REUSE. DESTROY CONTAMINATED SHOES AND LEATHER ITEMS.  
 INHALATION: REMOVE TO FRESH AIR IF EFFECTS OCCUR. CONSULT MEDICAL  
 PERSONNEL.

000668

The information contained herein is hereby presented as a complimentary act, in good faith, and is, to the best of The Dow Chemical Company's knowl-  
 edge and belief, accurate and reliable as of the date dictated, but may still be incomplete. No representation, guarantee or warranty is made as to its  
 accuracy, reliability, completeness and/or Governmental regulation and/or compliance with applicable laws, rules, regulations, orders, decrees, and  
 administrative orders and suitability for specific and uses prior to use.



# HERCULES OFFSHORE CO.

**MARINE REPAIR  
ORDER No.** \_\_\_\_\_

MARINE OPERATIONS FACILITY

INVOICE NO. \_\_\_\_\_

CUSTOMER P.O. \_\_\_\_\_

<b>D A T E</b>	ORDER SHIPPED 2-18-97	ETA 12:00 p.m.
	ADDRESS	
	COMPLETION DATE	
	DEPARTURE DATE	
<input type="checkbox"/> <b>NO</b> <input checked="" type="checkbox"/> <b>YES</b> NAME <b>ETT 115</b>		
POB <b>C. DUARTE</b> LAST PROPERTY		
GAS FREEING <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> CERTIFICATE REQUIRED <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>		
HAUL OUT FOR INSPECTION AND REPAIR <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>		
ON WAYS _____ DATE: _____		
ON WAYS _____ DATE: _____		

<b>C U S T O M E R</b>	NAME <b>BASF</b>
	BILLING ADDRESS
	CITY, STATE, ZIP <b>FREEPORT, TX 77541</b>
	PHONE NUMBER
ORDER SHIPPED BY _____ BY ESTIMATED BY _____	
STOCK MATERIAL <input type="checkbox"/> YES <input type="checkbox"/> NO	
IF YES, COMPLETE STOCK MATERIAL TRANSFER TICKET	
OUTSIDE SERVICES <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, LIST	

## ITEM NUMBERS

- 1 STRIP AND BLW.
- 2 *Purge Cargo Tanks with M: Lagoon*
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10

THIS SHALL SERVE AS YOUR AUTHORIZATION TO PROCEED WITH THE ABOVE.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

000669

# HERCULES OFFSHORE CO.

## MARINE REPAIR ORDER No. \_\_\_\_\_

MARINE OPERATIONS FACILITY

INVOICE NO. \_\_\_\_\_

CUSTOMER P.O. \_\_\_\_\_

DATE	ORDER NUMBER	2-18-97	VIA	12:00 p.m.
	ARRIVAL			
	COMPLETION DATE			
	DEPARTURE DATE			
	W/O	DATE		
	NAME	BTR 115		
	LOC			
	FOREMAN	C. DUARTE		
	LAST PRODUCT			
	GAS FREEING	YES <input type="checkbox"/>	CERTIFICATE REQUIRED	YES <input type="checkbox"/>
		NO <input type="checkbox"/>		NO <input type="checkbox"/>
	HAUL OUT FOR INSPECTION AND REPAIR	YES <input type="checkbox"/>	NO <input type="checkbox"/>	
	ON WAYS	DATE: _____		
	ON WAYS	DATE: _____		

CUSTOMER	NAME	BASF
	PHONE NUMBER	
	CITY AND STATE	FREEPORT, TX 77541
	ORDER NUMBER	
	WORK AUTHORIZED BY	DATE AUTHORIZED BY
	STOCK MATERIAL	<input type="checkbox"/> YES <input type="checkbox"/> NO
	IF YES, COMPLETE STOCK MATERIAL TRANSFER TICKET	
	OUTSIDE SERVICES	<input type="checkbox"/> YES <input type="checkbox"/> NO
	IF YES, LIST	

### ITEM NUMBERS

1 STRIP AND BLOW.

2

3

4

5

6

7

8

9

10

THIS SHALL SERVE AS YOUR AUTHORIZATION TO PROCEED WITH THE ABOVE.

Signed: Charles Duarte Date: 2-18-97

000670

**BASF 02/18/97**



2-5402  
ETT 115

BASF  
2-18-97

000671

# HERCULES

MARINE SERVICES CORPORATION

P. O. Drawer O • Freeport, Texas 77541

INVOICE NO. : 3768

DATE : Feb. 18, 1997

Job No. : 2-5402

Location : Freeport, TX

TO: BASF  
602 Copper Road  
Freeport, TX 77541

PLEASE REMIT PAYMENTS TO:  
11011 RICHMOND  
SUITE 500  
HOUSTON, TX. 77042

Terms : Net 30

FOR: Service to the ETT 115 as follows:

Strip and Blow. Purge cargo tanks with nitrogen.

LABOR:	Leadman	5 Hrs.	@	35.00 (ST)	\$ 175.00
	Leadman	3.5 Hrs.	@	49.50 (OT)	173.25
	Journeyman	23 Hrs.	@	32.50 (ST)	747.50
	Journeyman	3.5 Hrs.	@	45.75 (OT)	160.12
STOCK:	31.00	Plus 25%	@	7.75	38.75
EQUIPMENT:	Compressor	5 Hrs.	@	48.00	240.00
	Air Movers	20 Hrs.	@	5.00	100.00
	Forklift	3 Hrs.	@	30.00	90.00
	Vacuum	3 Hrs.	@	30.00	90.00
	Hand Hose	3 Hrs.	@	12.00	36.00

TOTAL AMOUNT DUE \$1,850.62

000672

PHONE: (409) 233-6371

# DAILY TIME LOG

DATE:	2-18-97	CUSTOMER:	BASF
JOB NO:	2-5402	BARGE:	ETT-115

START TIME 11:00 AM  
11:30 PM.

STOP TIME 4:30 PM  
3:30 AM

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
Claudio	5				
Cam	5				
Quinton	5				
Cruz	5				
Rivera	4				
SAM.	4				

## MATERIAL LIST:

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## JOB DESCRIPTION:

Strip Blow dry. w. Nitrogen Pad.

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000673

25121

# DAILY TIME LOG

DATE:	2-18-97	CUSTOMER:	BASF
JOB NO:	2-5402	WAGE:	ETT 115

START TIME 19:30 PM

STOP TIME 3:00 AM - 2-19-97

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
R.S. DeHit	3.5	3.5			
C. Duarte	3.5	3.5			

## MATERIAL LIST:

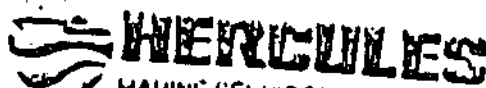
Nitrogen truck - U-Cisco

## JOB DESCRIPTION:

Purge Cargo Tanks - Truck Down from 0000 11:30 AM

7/14

000674



MACHINE SERVICES CORPORATION

Strength through environmental awareness and customer service

P.O. Drawer O  
Frisco, Texas 77541

Office (409) 213-0371  
Fax: (409) 213-4375

Date: 2-18-97 Job No: 5402 Name: MN: EXT-115

EQUIPMENT	HOURS
Compressor	5
Air Movers	20
Vacuum	3
Steam Rip	3
Hand Hose	
Boiler	3
2" Sump Pump	
3" Diesel Pump	
4" Electric Pump	
Crane	
Cherry Picker	
Forklift	
Top Boat	
Welding Machine	
Cutting Rig	
Work Hare	
Haul Out	
Truck	
Hand Tools	

STOCK	NUMBER
Coveralls	2
Batteries	
Respirator Filters	3
Gloves	2
Flashlights	
Gaskets	
Copples	
Boots	1
Raincoats	
White Rags	

7.10

18.00

5.90

000675



MACHINE SERVICES CORPORATION

Strength through environmental awareness and customer service

P.O. Drawer O  
Frisco, Texas 77541

Office (409) 233-0371  
Fax: (409) 233-0375

Date: 2-18-97 Job No: 5402 Range/MV: EXT-115

EQUIPMENT	HOURS
Compressor	
Air Movers	5
Vacuum	20
Steam Rig	3
Hand Hose	
Boiler	3
2" Strip Pump	
3" Diesel Pump	
4" Electric Pump	
Crane	
Cherry Picker	
Forklift	
Tug Boat	
Welding Machine	
Cutting Rig	
Work Horse	
Haul Out	
Truck	
Hand Tools	

STOCK	NUMBER
Coveralls	
Batteries	2
Respirator Filters	
Gloves	3
Flashlights	2
Gaskets	
Copples	
Boots	1
Raincoats	
White Rags	

000567

# Job Workscope/Breakdown

Job No: 2-5402 Date: 2-18-97 Invoice Number: 3768  
 Customer: BASF Barge/MV: E+T 115

Foreman:	S/T	<u>          </u>	@	38.00	<u>          </u>
	O/T	<u>3 1/2</u>	@	53.25	<u><del>186.38</del></u>
Leadman:	S/T	<u>5</u>	@	35.00	<u><del>175.00</del> 175.00</u>
	O/T	<u>3 1/2</u>	@	49.50	<u>173.25</u>
Journeyman:	S/T	<u>23</u>	@	32.50	<u><del>736.00</del> 747.50</u>
	O/T	<u>3 1/2</u>	@	45.75	<u><del>140.13</del> 160.12</u>
Disposal:	Slop Oil	<u>          </u>	@	0.60	<u>          </u>
	Water	<u>          </u>	@	0.35	<u>          </u>
Water:		<u>          </u>	@	5.00/1,000 gal	<u>          </u>
Material:		<u>          </u>	Plus 25%		<u>          </u>
Stock:		<u>31.00</u>	Plus 25%	<u>7.75</u>	<u>38.75</u>
Chemist:		<u>          </u>	Plus 25%		<u>          </u>
Equipment:	Compressor	<u>5</u>	@	48.00	<u>240.00</u>
	Air Movers	<u>20</u>	@	5.00	<u>100.00</u>
	Forklift	<u>3</u>	@	30.00	<u>90.00</u>
	Tugboat	<u>          </u>	@	100.00	<u>          </u>
	Steam Rig	<u>          </u>	@	100.00	<u>          </u>
	Vacuum	<u>3</u>	@	30.00	<u>90.00</u>
	Hand Hose	<u>3</u>	@	12.00	<u>36.00</u>
	Weld Machine	<u>          </u>	@	15.00	<u>          </u>
	Cherry Picker	<u>          </u>	@	70.00	<u>          </u>
	Crane	<u>          </u>	@	130.00	<u>          </u>
	3" Gas Pump	<u>          </u>	@	18.00	<u>          </u>
	2" Strip Pump	<u>          </u>	@	15.00	<u>          </u>
	Butterworth	<u>          </u>	@	10.00	<u>          </u>
	4" Elec. Pump	<u>          </u>	@	15.00	<u>          </u>
	Cutting Rig	<u>          </u>	@	8.00	<u>          </u>
	Haul Out	<u>          </u>	@	1,100.00	<u>          </u>
	Truck	<u>          </u>	@	25.00	<u>          </u>
	Hand Tools	<u>          </u>	@	10.00	<u>          </u>

000677

Total Invoice:

~~3026.1~~  
~~81838.38~~ 1850.69  
81838.38

BASF 02/09/97



— 2-5396 BASF —  
ETT 110 2-9-97

000678

# HERCULES

MARINE SERVICES CORPORATION

P. O. Drawer O • Freeport, Texas 77541

INVOICE NO. : 3762

DATE : Feb. 9, 1997

Job No. : 2-5396

Location : Freeport, TX

TO:

BASF  
602 Copper Road  
Freeport, Texas 77541

PLEASE REMIT PAYMENTS TO:  
11011 RICHMOND  
SUITE 500  
HOUSTON, TX. 77042

Terms : Net 30

FOR:

Service to the ETT 110 as follows:

Strip and Blow. Check engine for oil leakage.  
Located and removed cover with hole, weld hole and  
replace cover.

LABOR:	Leadman	7.5 Hrs.	@	35.00 (ST)	262.50
	Journeyman	28 Hrs.	@	32.50 (ST)	910.00
STOCK:	45.10	Plus 25%		11.28	56.38
EQUIPMENT:	Compressor	5 hrs.	@	48.00	240.00
	Air Movers	20 hrs.	@	5.00	100.00
	Vacuum	3 hrs.	@	30.00	90.00
	Hand Hose	3 hrs.	@	12.00	36.00

TOTAL AMOUNT DUE

\$1,694.88

000679

PHONE: (409) 233-6371

Strength through Experience, Equipment, Know-How

# DAILY TIME LOG

DATE:	2-9-97	CUSTOMER:	BASF
JOB NO:	5396	BARGE:	ETT-110

START TIME 9:00 AM  
2:00 PM

STOP TIME 12:00 PM  
7:00 PM

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
Claudio	7 1/2				
Cass	6 1/2				
Quinten	6 1/2				
Cass	6 1/2				
River	6 1/2				
Sal	2				

## MATERIAL LIST:

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## JOB DESCRIPTION:

Setup and stand-by for Strip & Blow Barge (110).  
 Upon arrival (Strip & Blow Barge)  
 Check for oil leak (oil spill on Deck); located oil hole  
 on sensor plate cover to motor. ~~Not~~ Removed and welded  
 hole on plate. Reinstalled on motor.

35 1/2 hrs

000680



MAINE SERVICES CORPORATION

Strength through environmental awareness and customer service

P.O. Drawer 0  
Freeport, Texas 77541

Office (409) 233-6371  
Fax: (409) 233-6375

Date 2-9-92 Job No: 2-5396 Name/MV: ETT-110

EQUIPMENT	HOURS
Compressor	
Air Movers	5
Vacuum	20
Steam Rip	3
Hand Hare	
Roller	3
2" Strip Pump	
3" Diesel Pump	
4" Electric Pump	
Crane	
Cherry Picker	
Forklift	
Top Boat	
Welding Machine	
Cutting Rip	
Work Hare	
Haul Out	
Truck	
Hand Tools	

STOCK	NUMBER
Coveralls	
Batteries	2
Respirator Filters	2
Gloves	4
Flashlights	2
Gaskets	
Couplers	
Boots	2
Raincoats	
White Caps	

7.10  
4.50  
24.00  
3.50

4.00

000681



MAINE SERVICES CORPORATION

Strength through environmental awareness and customer service

P.O. Drawer O  
Freeport, Texas 77541

Office (409) 233-6371  
Fax: (409) 233-6375

Date: 2-9-97 Job No: 2-5396 Name: MV: ETT-110

EQUIPMENT	HOURS
Compressor	5
Air Movers	20
Vacuum	3
Steam Rip	
Hand Hose	
Roller	3
2" Sump Pump	
3" Diesel Pump	
4" Electric Pump	
Crane	
Cherry Picker	
Forklift	
Tug Boat	
Welding Machine	
Cutting Rig	
Work Horse	
Haul Out	
Truck	
Hand Tools	

STOCK	NUMBER
Coveralls	2
Batteries	2
Respirator Filters	4
Gloves	2
Flashlights	
Gaskets	
Couplers	
Boots	2
Raincoats	
White Rags	

000682

# Job Workscope/Breakdown

Job No: 2-5396 Date: 2-9-97 Invoice Number: 3762

Customer: BARF Barge/MAY ETT 110

Travel Time: \_\_\_\_\_ Hours @ 17.50/Hour  
Mileage : \_\_\_\_\_ Miles @ 0.25/Mile  
Foreman: S/T \_\_\_\_\_ @ 38.00

O/T \_\_\_\_\_ @ 53.25

Leadman: S/T 7 1/2 @ 35.00 262.50

O/T \_\_\_\_\_ @ 49.50

Journeyman: S/T 28 @ 32.50 910.00

O/T \_\_\_\_\_ @ 45.75

Disposal: Slop Oil \_\_\_\_\_ @ 0.60

Water \_\_\_\_\_ @ 0.35

Water: \_\_\_\_\_ @ 5.00/1,000 gal

Material: \_\_\_\_\_ Plus 25% \_\_\_\_\_

Stock: 45.10 Plus 25% 11.28 56.38

Chemist: \_\_\_\_\_ Plus 25% \_\_\_\_\_

Equipment: Compressor 5 @ 48.00 240.00

**MATERIAL COST:** Air Movers 20 @ 5.00 100.00

Coveralls - 3.55 Ea. Forklift \_\_\_\_\_ @ 30.00

Batteries - 2.25 Ea. Tugboat \_\_\_\_\_ @ 100.00

Respirator Fil- 6.00 Ea. Steam Rig \_\_\_\_\_ @ 100.00

Gloves - 1.75 Ea. Vacuum 3 @ 30.00 90.00

Flashlights - 12.00 Ea. Hand Hose 3 @ 12.00 36.00

Gaskets - 6.00 Ea. Weld Machine \_\_\_\_\_ @ 15.00

Goggles - 2.95 Ea. Cherry Picker \_\_\_\_\_ @ 70.00

Boots - 9.00 Ea. Crane \_\_\_\_\_ @ 130.00

Raincoats - 36.65 Ea. 3" Gas Pump \_\_\_\_\_ @ 18.00

White Rags - 9.93/Box 2" Strip Pump \_\_\_\_\_ @ 15.00

Cleaner - 72.75 Buterworth \_\_\_\_\_ @ 10.00

Cost + 25% Charge to Customer. 4" Elec. Pump \_\_\_\_\_ @ 15.00

Curing Rig \_\_\_\_\_ @ 8.00

Haul Out \_\_\_\_\_ @ 1,100.00

Truck \_\_\_\_\_ @ 25.00

Hand Tools \_\_\_\_\_ @ 10.00

Total Invoice:

8,694.88

000683

— 2-5396  
ETT 110

BASF  
2-9-97 —

000684

# HERCULES OFFSHORE CO.

## MARINE REPAIR

MARINE OPERATIONS FACILITY

ORDER No. 2-5396

INVOICE NO. 3762

CUSTOMER P.O.

DATE	ORDER DATE	2-9-97	ETA	10:00 a.m.
	ARRIVAL			
	COMPLETION DATE			
	DEPARTURE DATE			
B/C <input type="checkbox"/> BASES <input checked="" type="checkbox"/> ETT 110 MAKE _____ LSA _____				
FOREMAN C. DUARTE				
LAST PRODUCT				
GAS FREEING YES <input type="checkbox"/> NO <input type="checkbox"/> CERTIFICATE REQUIRED YES <input type="checkbox"/> NO <input type="checkbox"/>				
HAUL OUT FOR INSPECTION AND REPAIR YES <input type="checkbox"/> NO <input type="checkbox"/>				
ON WAYS _____ DATE: _____				
ON WAYS _____ DATE: _____				

CUSTOMER	NAME	BASF
	ADDRESS	
	CITY AND STATE	FREEPORT, TX 77541
	PHONE NUMBER	
WORK AUTHORIZED BY R. PETERS		BY AUTHORIZED BY
STOCK MATERIAL <input type="checkbox"/> YES <input type="checkbox"/> NO		
IF YES, COMPLETE STOCK MATERIAL TRANSFER TICKET		
OUTSIDE SERVICES <input type="checkbox"/> YES <input type="checkbox"/> NO		
IF YES, LIST		
_____		
_____		
_____		

### ITEM NUMBERS

1 STRIP AND BLOW. CHECK ENGINE FOR OIL LEAKAGE.

2

3

4

5

6

7

8

9

10

THIS SHALL SERVE AS YOUR AUTHORIZATION TO PROCEED WITH THE ABOVE.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

000685



## HERCULES OFFSHORE CO.

## MARINE REPAIR

MARINE OPERATIONS FACILITY

INVOICE NO. \_\_\_\_\_

ORDER No. 2-5396

CUSTOMER P.O. \_\_\_\_\_

DATE	WORK ORDER	ETA
	2-9-97	10:00 a.m.
	ARRIVAL	
	COMPLETION DATE	
	DEPARTURE DATE	
	SHIP <input type="checkbox"/> BARGE <input checked="" type="checkbox"/> <u>XX</u>	
	NAME <u>ETT 110</u>	
	LOG	PHONE
	FORWARD	
	<u>C. DURRIS</u>	
	LAST PRODUCT	
	GAS FREEING YES <input type="checkbox"/> NO <input type="checkbox"/>	CERTIFICATE REQUIRED YES <input type="checkbox"/> NO <input type="checkbox"/>
	HAUL OUT FOR INSPECTION AND REPAIR YES <input type="checkbox"/> NO <input type="checkbox"/>	
	ON WAYS	DATE: _____
	ON WAYS	DATE: _____

CUSTOMER	NAME	
	BASF	
	BILLING ADDRESS	
	CITY AND STATE	
	FREEPORT, TX 77541	
	PHONE NUMBER	
	WORK SUPERVISOR BY	BY SUPERVISOR BY
	R. PETERS	
	STOCK MATERIAL	<input type="checkbox"/> YES <input type="checkbox"/> NO
	IF YES, COMPLETE STOCK MATERIAL TRANSFER TICKET	
	OUTSIDE SERVICES	<input type="checkbox"/> YES <input type="checkbox"/> NO
	IF YES, LIST	

## ITEM NUMBERS

1 STRIP AND BLOW. CHECK ENGINE FOR OIL LEAKAGE.

2 Locate and remove cover with hole, weld hole & replace cover.

3

4

5

6

7

8

9

10

THIS SHALL SERVE AS YOUR AUTHORIZATION TO PROCEED WITH THE ABOVE.

Signed: Charles P. SmithDate: 2-9-97

000686

JOB NO. \_\_\_\_\_

## BARGE CLEANING REPORT

BARGE NO. ELT2110COUNTRY BASFPRODUCT N-BUTANOL

ETA \_\_\_\_\_

DATE/TIME ARRIVAL 2-2-97 22DATE/TIME STARTED 2-2-97 22DATE/TIME COMPLETED 2-2-97 22CLEANING INSTRUCTION BY: Robert PetersAMOUNT STRIPPED 300

COMPLETION SCHEDULE BY: \_\_\_\_\_

OVERTIME AUTHORIZED BY: Robert PetersBARGE INSPECTED BY: DuarteBARGE RELEASED TO: Brown Water IVDATE/TIME: 6:00 PMDATE/TIME: 6:45 PMDECKWELL OPENED: YES N/A NO \_\_\_\_\_ CLOSED BY \_\_\_\_\_ NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_BELOW DECK CARGO PIPELINE: BLIND OPEN YES \_\_\_\_\_ NO \_\_\_\_\_ CLOSED BY Robert Peters NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_DECK CHECK VALVE OPENED: YES N/A NO \_\_\_\_\_ CLOSED BY \_\_\_\_\_ NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_DECK HEADER BLINDS OPEN: N/A INSPECTED BY Caleb Brett YES \_\_\_\_\_ NO \_\_\_\_\_DECK HEADER DRAIN PLUG OPEN: YES \_\_\_\_\_ NO \_\_\_\_\_ CLOSED BY CHIN YES \_\_\_\_\_ NO \_\_\_\_\_VAPOR RECOVERY HEADER OPENED: YES \_\_\_\_\_ NO \_\_\_\_\_ CLOSED BY CASH NEW CASSET YES \_\_\_\_\_ NO \_\_\_\_\_RUST SCALE: YES N/A NO \_\_\_\_\_ WASHED OUT \_\_\_\_\_ BUCKETED OUT \_\_\_\_\_NUMBER OF CARGO TANKS 3CONDITION OF CARGO VALVES GoodSLOP TANK STRIPPED: YES N/A NO \_\_\_\_\_DRIP PANS STRIPPED: YES N/A NO \_\_\_\_\_WEATHER: TEMP 60 RAIN \_\_\_\_\_ FOG \_\_\_\_\_ HUMIDITY \_\_\_\_\_ OVERCAST N/A CLOUDY N/A CLEAR \_\_\_\_\_PIPELINE WASHED: NO PIPELINE BLOWN N/A INSPECTED BY Caleb Brett

BOW RAKE CHECKED: YES \_\_\_\_\_ NO \_\_\_\_\_ STERN RAKE: YES \_\_\_\_\_ NO \_\_\_\_\_

VOIDS: YES \_\_\_\_\_ NO \_\_\_\_\_ SAFETY EQUIPMENT USED: \_\_\_\_\_

SUMMARY: \_\_\_\_\_

## NOTICE

All barges cleaned for BASF will be inspected by Caleb Brett. The inspector will have paperwork for the Hercules foreman in charge to sign. The foreman will put two copies in the document mail box. One copy will stay in the mailbox, and the captain of the tugboat that is picking up the barge will not be called until inspection is completed and documentation is in the mailbox. If any problems, BASF logistics representative must be contacted.

Inspected 2-19-97

1835

15.00

Time Out

Inspected by A. Duarte

NO BASF BARGE THAT HAS BEEN CLEANED WILL BE RELEASED UNTIL CALED BRET INSPECTION IS COMPLETED. CALED BRET WILL BE GIVEN A COPY OF THIS FORM.

000687

## TIME LOG

### YOUR REFERENCE

## OUR REFERENCE

VESSEL ETT-110	PRODUCT/CARGO N/A	PORT/TERMINAL AL-174105	DATE 2-5-97
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[illegible]

000688

For Vessel

**FOR SALE BY RETAIL**



# Inchcape Testing Services

Caleb Brett

## VISUAL TANK INSPECTION REPORT

YOUR REFERENCE
OUR REFERENCE

VESSEL FIT-110	PRODUCT / CARGO W/H	PORT / TERMINAL Hercules	DATE 2-9-97
-------------------	------------------------	-----------------------------	----------------

689000

Tank Number	1,2,3c						
Tank Coating	W/H						
Last Cargo	W/H						
Second Last Cargo	↓						
Third Last Cargo	↓						
Time/Date Inspected	25-97/1830						
Visual Cleanliness Accepted/Rejected*	Accepted						
Reason for Rejection	W/H						

Method said to have been used to clean tanks:	TK#	Strip + blow
	TK#	Stripped product from cargo lines - blow dry for 3 hours
	TK#	Stripped product from cargo tanks & blow dry for 1 1/2 hours
	TK#	
	TK#	
	TK#	
	TK#	

Information regarding previous cargoes, tank coating and cleaning method was obtained from vessel personnel and cannot be guaranteed as accurate by Caleb Brett. No liability can be assumed for errors resulting from improper information supplied. This report, of necessity, is based on such information.

The cleanliness of inspected tank(s) is/are based on visual inspection of tank surfaces and line system at accessible areas only. This document does not cover cleanliness of tank surfaces and line system at inaccessible spots and/or possible release of components of previous cargoes during loading, discharge or port of the cargo in question, for which the vessel is fully responsible. Suitability of tank coating for intended cargo must be guaranteed by vessel's owner/suppliers of the coating.

*[Signature]*

*[Signature]*

FOR CALEB BRETT



P.O. Drawer 0  
Freeport, Texas 77541

Office: (409) 233-0371  
Fax: (409) 233-0375

### FINAL CHECK LIST

DATE: 2-9-97

CARGO: ETT-110

NUMBER CHECKED 2 REPLACED GASKET YES NO  
GATE VALVE NUMBER CHECKED 5 REPLACED GASKET YES NO  
PLUGS NUMBER CHECKED N/A REPLACED PLUG YES NO  
CHECK VALVE NUMBER CHECKED N/A REPLACED GASKET YES NO  
DEEPWELL BLIND NUMBER CHECKED N/A REPLACED GASKET YES NO  
LOW DECK CARGO PIPELINE BLIND NUMBER 2 REPLACED GASKET YES NO  
LOW DECK CARGO PIPELINE BLIND REMOVED YES NO  
DIP PANS VALVES: CLOSED BY CNZ  
DIP PANS COVER: CLOSED BY N/A  
CONTAINMENT AREA PLUG OR VALVES: CLOSED BY N/A

AIR TEST CARGO LINE - 40psi - USING SOAP

SIGNATURE OF TESTER: Charles Puente

WITNESS: Luan J. Quintana

CHECK VALVE GASKET WILL BE REPLACED

AIR TEST IS LAST THING TO BE DONE BEFORE RELEASING CARGO.

000690

## \* Rules and Regulations for Tank Vessels.

# HAZARD COMMUNICATION STANDARD

OSHA 1910.1200

## EMPLOYEE HAZARDOUS MATERIALS TRAINING PROGRAM

Date 2-9-92

Supervisor Charles D. Smith

Plant HERCULES

Client Safety                     

Area BASELINE DOCK  
ETTE-110

The following listed materials are considered to be hazardous to the employee working in this area:

<u>ACETONE</u>	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

The employees assigned to work in this area have been informed of the hazardous materials in this area, the hazards they present to the workers, the location of hazards listed, the protective equipment that has been provided and where it is located, and procedures to be followed in case of an accidental exposure. I have received the training listed above and will so designate by signing this form.

NAME	BADGE	NAME	BADGE
<u>Jose A Casas</u>	_____	_____	_____
<u>John C. Smith</u>	_____	_____	_____
<u>James P. Smith</u>	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

000692

# EMERGENCY RESPONSE INFORMATION SHEET

FLAMMABLE  
LIQUID  
NA1120

C. 12912

N-BUTANOL

FORM: LIQUID, CLEAR  
SPECIFIC GRAVITY: 0.8  
SOLUBILITY IN WATER: MIXES SLIGHTLY  
FREEZING POINT: -128°F  
BOILING POINT: 243.9°F  
FLASH POINT: 97°F (TOC)

FLAMMABLE LIMITS: 1.4% - 11.2%  
VAPOR HAZARD: FLAMMABLE.  
IRRITATING.  
REACTS WITH: OXIDIZING MATERIALS,  
COPPER AND ITS ALLOYS.

## HEALTH HAZARDS

ANIMAL: AVOID INGESTION. AVOID EXPOSURE.  
FISH: AVOID ENTRY INTO NATURAL WATERS. MAY CAUSE LOCALIZED FISH KILL.  
EYES: MODERATE BURN. MODERATE IRRITATION.  
SKIN: MODERATE IRRITATION; TOXIC BY ABSORPTION UPON CROSS CONTACT.  
INHALATION: SLIGHTLY IRRITATING. DROWSINESS, UNCONSCIOUSNESS.  
INGESTION: LOW TOXICITY.

## IN CASE OF ACCIDENT

SPILL  
LEAK

FLAMMABLE. IRRITATING. KEEP UPWIND. ISOLATE AREA AND DENY ENTRY.  
DO NOT GET IN EYES. AVOID CONTACT WITH SKIN. AVOID BREATHING VAPORS.  
USE WATER SPRAY TO REDUCE VAPOR. NO SMOKING, FLARES, OR OPEN FLAMES.  
SHUT OFF IGNITION AND LEAK IF WITHOUT RISK. USE NONCOMBUSTIBLE ABSORBENT  
MATERIAL/SAND AND SHOVEL INTO SUITABLE CONTAINERS.  
DIKE LARGER SPILLS AND RECOVER. AVOID ENTRY INTO SEWERS AND/OR NATURAL  
WATERS.  
CLOTHING: WEAR FULL PROTECTIVE CLOTHING AND SELF-CONTAINED BREATHING  
APPARATUS.  
DISPOSAL: CONTACT MANUFACTURER AND AUTHORITIES

RELEASE

FLAMMABLE. IRRITATING.  
DO NOT PUT OUT ANY FIRES AT VENTS UNTIL LEAK IS SHUT OFF.  
MAY DECOMPOSE IN HEAT/FIRE RELEASING PRODUCTS OF GREATER HAZARD.  
COOL CONTAINERS EXPOSED TO HEAT/FIRE WITH WATER TO PREVENT BURSTING.  
SMALL FIRES: USE DRY CHEMICAL OR CO<sub>2</sub>.  
LARGE FIRES: USE WATER SPRAY, FOG, OR ALCOHOL FOAM. IF MASSIVE FIRE:  
USE UNMANNED HOSE HOLDER OR MONITOR NOZZLES. IF THIS IS IMPOSSIBLE,  
WITHDRAW FROM AREA AND LET FIRE BURN. DIKE LIQUID RUN-OFF.  
AVOID ENTRY INTO SEWERS AND/OR NATURAL WATERS.

FIRST  
AID

EYES: IRRIGATE WITH FLOWING WATER IMMEDIATELY AND CONTINUOUSLY FOR 15  
MINUTES. CONSULT MEDICAL PERSONNEL.  
SKIN: IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES  
WHILE REMOVING CONTAMINATED CLOTHING. CONSULT MEDICAL PERSONNEL.  
CLOTHING: REMOVE CONTAMINATED CLOTHING IMMEDIATELY AND WASH BEFORE  
REUSE. DESTROY CONTAMINATED SHOES AND LEATHER ITEMS.  
INHALATION: REMOVE TO FRESH AIR IF EFFECTS OCCUR. CONSULT MEDICAL  
PERSONNEL.

000693

The information contained herein is hereby presented as a complimentary act, in good faith, and is, to the best of The Dow Chemical Company's knowl-  
edge and belief, accurate and reliable. It is not intended to be a substitute for professional advice, and may not be complete. No representation, guarantee or warranty is made as to its  
accuracy, reliability or completeness and, as Governmental regulations change, the user assumes the responsibility for keeping the information current and suitable for specific end uses prior to use.

DOW CHEMICAL U.S.A.

R-04-01-81



*Background from 1996*

January 3, 1997

Mr. Thomas E. Hord  
Vice President  
Hercules Marine Services Corporation  
906 Marlin  
Freeport, Texas 77541

Re: Permit Application  
Permit No. 32768  
Barge Cleaning and Repair  
Freeport, Brazoria County  
Account ID No. BL-0118-V

Dear Mr. Hord:

As you requested in your application withdrawal letter dated December 12, 1996, we are voiding the active Permit Application File No. 32768. We understand that the facility retains its grandfathered status and therefore does not require a permit at this time.

All records regarding this application will be retained in case you should wish to reactivate the project in the future; however, any future reactivation will require that you reapply under the requirements of 30 TAC Chapter 116 in effect at that time.

Thank you for informing us of the status of this application.

Sincerely,

Victoria J. L. Hsu, P.E.  
Director  
New Source Review Division

VH/kh/jb

000694

cc: Ms. Karen Atkinson, Acting Regional Manager, Houston  
Harry Walker, Ph.D., Walker, H. M. & Associates, Dickinson

000695

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

HARRY WALKER PHD  
WALKER H M & ASSOCIATES  
3321 EAST BAYOU DR  
DICKINSON TX 77539

000696

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

MR THOMAS E HORD  
VICE PRESIDENT  
HERCULES MARINE  
SERVICES CORPORATION  
906 MARLIN  
FREEPORT TX 77541

000697

**Withdrawal**  
**TECHNICAL REVIEW**

Permit No: **32768**  
Project Type: **Withdrawal**  
City: **Freeport**  
Record No: **43911**  
Account No: **BL-0118-V**

Company: **Hercules Marine Services**  
Facility Name: **Barge Cleaning and Repair**  
County: **Brazoria**

**AUTHORIZATION CHECKLIST** (any "Yes" requires signature by Executive Director):

Will a new policy/precedent be established? **No**  
Was at least one public hearing request received? **No**  
If yes, was/were all the request(s) withdrawn? **No**  
Is a state or local official opposed to the permit? **No**  
If yes, please provide name and title of official.  
Is waste or tire derived fuel involved? **No**  
Are waste management facilities involved? **No**

**PROJECT OVERVIEW**

Hercules Marine Services requested withdrawal of their application for a construction permit on December 12, 1996. Hercules was issued a standard permit on November 12, 1996 for a vapor combustor unit and they no longer need this permit. No permit is needed because the facility retains its grandfathered status.

Permit Engineer  
Date

Date

Team Leader/Section Manager/Backup

000698

From: NSR Document Server  
To: LEGAL.ENFPO.MHALL  
Date: 9/18/97 2:09pm  
Subject: Retrieve Request: 5 = 32768 -Reply

Based on your request to GET "(5 = 32768) ",  
The nsr document management system has located the following document(s):

Dataset: ANSRP01

Doc #	Date Created	Author	DocType	App	Permit #	Record #
125400	01/03/97	KHAUER	TRV	WPWIN	32768	43911
Hercules Marine Services						
125109	12/24/96	KHAUER	C7	WPWIN	32768	43911
Hercules Marine Services Corp C7						
123907	12/06/96	KHAUER	C29B	WPWIN	32768	43911
C29B - HERCULES MARINE SERVICES CORPORATION						
120686	10/18/96	KHAUER	C29A	WPWIN	32768	43911
C29A - HERCULES MARINE SERVICES CORPORATION						
115904	08/14/96	KHAUER	C29A	WPWIN	32768	43911
C29A - HERCULES MARINE SERVICES CORPORATION						
114285	07/25/96	KHAUER	PN	WPWIN	32768	43911
hercules Marine services						
112885	07/05/96	KHAUER	PN	WPWIN	32768	43911
PN - HERCULES MARINE SERVICES CORPORATION						
112884	07/05/96	KHAUER	C26	WPWIN	32768	43911
C26 - HERCULES MARINE SERVICES CORPORATION						
108554	06/11/96	SRAJAGOP	C33	WPWIN	32768	43911
C33 - HERCULES MARINE SERVICES CORPORATION						

**Publication in the Public Notice Section of the Newspaper**

**TO ALL INTERESTED PERSONS AND PARTIES:**

You are hereby notified that **HERCULES MARINE SERVICES CORPORATION** has applied for Texas Natural Resource Conservation Commission (TNRCC) Air Quality Permit No. **32768**. This permit, if approved, will authorize construction of a **Facility in Freeport, Brazoria County, Texas**. The location of the existing facility is **906 Marlin**. This facility will emit the following air contaminants: **carbon monoxide, oxides of nitrogen, sulfur dioxide, particulate matter, and hydrocarbons**.

A copy of all materials in the public file is available for inspection and reproduction at the **TNRCC Houston Regional Office, Air Program at 5425 Polk Street, Suite H, Houston, Texas 77023-1423, telephone (713) 767-3500**, and at the TNRCC Central Office, 12100 Park 35 Circle, Austin, Texas 78753, telephone (512) 239-1000. The facility's compliance file, if any exists, is available for public review in the Regional Office of the TNRCC. Inquiries about the permit application and any information concerning any technical aspect of this application can be obtained by writing **Ms. Kate Hauer**, TNRCC Office of Air Quality, New Source Review Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087 or the **TNRCC Houston Regional Office**.

You may submit written comments concerning the permit application to the TNRCC Office of Air Quality, New Source Review Division in Austin. All written comments received within 30 days after the second publication of this notice shall be considered by the TNRCC Executive Director in determining whether to issue or not issue the permit. All written comments will be made available for public inspection at the TNRCC Central Office in Austin. This notice is to be published on (a)\* and (b)\*.

Any person who may be affected by emissions of air contaminants from the proposed facility may request the Commission to hold an informal public meeting and/or contested case hearing on the permit application pursuant to Section 382.056(d) of the Texas Health and Safety Code. The Commission is not required to hold a contested case hearing if the basis of a request is determined to be unreasonable. All requests for a contested case hearing must be received in writing within the 30-day comment period regardless of whether an informal public meeting has been held or scheduled on this matter. If you wish to request a public hearing, you must submit your request in writing. You must state (1) your name, mailing address, and daytime phone number; (2) the permit number or other recognizable reference to this application; (3) the statement "I/we request a public hearing"; (4) a brief description of how you, or the persons you represent, would be adversely affected by the granting of the application; (5) a description of the location of your property relative to the applicant's operations; and (6) your proposed adjustment to the application/permit which would satisfy your concerns and cause you to withdraw your request for hearing. Requests for a public hearing on this application should be submitted in writing to Office of the Chief Clerk (MC-105), Texas Natural Resource Conservation Commission, P.O. Box 13087, Austin, Texas 78711-3087, telephone (512)

239-3300.

Before a permit can be issued for this facility, the applicant must demonstrate that all emission sources are in compliance with all TNRCC air quality rules and regulations and all applicable Federal regulations. This includes the application of "best available control technology" to each new or modified emission source and compliance with all ambient air quality standards.

see "EXAMPLE A NOTES"

Notes: Insert the dates of publication in blanks (a) and (b) if this notice will be published twice. Delete the sentence if this notice will be published only once. Bolded text highlights critical information; however, bolded fonts are not required in the newspaper print.

TNRCC construction permitEXAMPLE A  
const.pnRevised 1/96

000701



Publication Elsewhere in the Newspaper

TO ALL INTERESTED PERSONS AND PARTIES:

**HERCULES MARINE SERVICES CORPORATION** has made application with the Texas Natural Resource Conservation Commission for Air Quality Permit No. **32768** to construct a **Facility in Freeport, Brazoria County, Texas**. The location of the **existing** facility is **906 Marlin**. Additional information concerning this application is contained in the public notice section of this newspaper. This notice is to be published on (a)\* and (b)\*.

\*see "EXAMPLE B NOTES"

000702

Notes: Insert the dates of publication in blanks (a) and (b) if this notice will be published twice.  
Delete the sentence if this notice will be published only once. **Bolded text highlights critical**  
information; however, bolded fonts are not required in the newspaper print.

TNRCC Construction permitEXAMPLE B  
const.pnRevised 1/96

000703

## NOTIFICATION LIST AND CERTIFICATION FORM

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, a completed copy of any Publishers' Affidavits required (example enclosed), a completed copy of the Bilingual Notice Certification Form, and a completed copy of the sign certification found at the bottom of this page. Originals should be sent to the TNRCC Office of Air Quality, New Source Review Division in Austin.

Environmental Protection Agency  
Regional Administrator  
Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Ms. Karen Atkinson, Manager  
Air Program  
TNRCC Region No. 12  
5425 Polk Street, Suite H  
Houston, Texas 77023-1423

Texas Natural Resource  
Conservation Commission  
Office of Air Quality  
New Source Review Division (MC-162)  
Ms. Kate Hauer  
P.O. Box 13087  
Austin, Texas 78711-3087

Leo D. O'Gorman, M.D., Director  
Brazoria County Health Department  
432 East Mulberry  
Angleton, Texas 77515

I certify that the signs required by Title 30 Texas Administrative Code, Section 116.133 were posted in accordance with the provisions of that section. I also certify that copies of the notices and the requested certifications have been furnished to the above listed offices in accordance with §116.134.

Signed by:  
Title:  
Company:  
Date:

cert.pnRevised 1/96

000705

ATTENTION: BILINGUAL NOTICE REQUIREMENTS FOR

**PERMITS**

Title 30 Texas Administrative Code Sections 116.132(c) and 116.133(f) require public notice in each alternate language for which a bilingual educational program at the elementary or middle school nearest the facility is required under the Education Code Section 21.109 and the Title 19 Texas Administrative Code Section 89.2(a).

Bilingual public notification rules require determining whether an applicable program exists at either the elementary or middle school nearest to the proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are enrolled in a bilingual education program, §116.132(c) and §116.133(f) apply. Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the above-mentioned schools.

Section 116.132(c) requires publication of alternate language newspaper notices in a newspaper or publication of general circulation. Publications of alternate language notices must be made in a newspaper or publication printed in each language taught in the bilingual education program, if such a newspaper or publication exists in the municipality or the county where the facility is or will be located. If a general circulation newspaper or publication printed in such language cannot be found, publishing in that language is not required. Publication in an alternate language section or insert within a large publication which is not printed primarily in that alternate language does not satisfy these requirements. **Notice must be published in two consecutive issues if the newspaper is published once a week or more frequently. Otherwise, only one publication is required.**

Section 116.133(f) requires posting of alternate language signs if a bilingual education program is required at the elementary or middle school nearest the facility. A sign in each such language should be posted adjacent to each English language sign. **It is important to note that, if sign posting is required under §116.133(f), the signs must be posted even if the publishing required under §116.132(c) could not be done.**

The applicant has the burden to demonstrate compliance with §116.132(c) and §116.133(f). To satisfy this burden, the applicant must:

A. Certify that either:

- (1) A diligent search found that there are no bilingual educational program requirements; or
- (2) A bilingual educational program is required; and

B. If a bilingual educational program is required, the applicant must:

- (1) Certify which languages are required in the program and post signs in those languages, and
- (2) Publish notices in each of those languages and provide copies of the required publications in each language; or
- (3) Certify the applicant conducted a diligent search and:
  - a. Found no appropriate newspapers or publications in the specified languages; or
  - b. The applicant found appropriate newspapers or publications, but the publisher(s) of the newspapers refused to publish notice, (the applicant must specify which newspaper or publication refused to publish notice).

It is suggested the applicant work with the local school district to do the following:

- (a) determine if a bilingual program is required in the district;
- (b) locate the nearest elementary and middle schools;
- (c) determine if any students required to attend either school are enrolled in a bilingual educational program; and
- (d) which languages are utilized by the students enrolled in the program.

**\*Public notice examples in Spanish are available from the permit engineer upon request.**

Binotice.pn Revised 1/5/96

## BILINGUAL NOTICE CERTIFICATION FORM

I certify that, by signifying answers with initials: Initials

- (a) I have contacted the appropriate school district, and a bilingual program  
exists in the district; \_\_\_\_\_

or, I have contacted the appropriate school district, and NO bilingual program  
exists in the district \_\_\_\_\_

School District: \_\_\_\_\_

Contacted: \_\_\_\_\_

Date: \_\_\_\_\_

- (b) The name of the elementary school nearest to the proposed facility is:  
\_\_\_\_\_

- (c) The name of the middle school nearest to the proposed facility is:  
\_\_\_\_\_

- (e) Students who are required to attend one of the schools above are enrolled in a  
bilingual program provided by the district; \_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_

- (f) The following language(s) is/are utilized by students enrolled in the program:  
\_\_\_\_\_  
\_\_\_\_\_

Signed by:  
Title:

Company:  
Date:

If an applicable bilingual program exists, post signs and publish notice as outlined in "Bilingual Notice Requirements."

\* I certify that the alternate language signs were posted as required in 30 TAC §116.133(f).

Signed by:

Company:

000707

Title:

Date:

\* I certify that the company conducted a diligent search for a newspaper or publication of general circulation in the municipality or county in which the facility is located or proposed to be located and that no such newspaper or publication was found in any of the following languages in which notice is required: \_\_\_\_\_

Signed by:  
Title:

Company:  
Date:

\* I certify that the publishers of the following newspapers have refused to publish notice as requested, and no other newspaper or publication in the same language and of general circulation was found in the municipality or county in which the facility is located or proposed to be located:

Newspaper:  
Signed by:  
Title:

Language:  
Company:  
Date:

Binotice.pn Revised 1/5/96

000708

**From:** NSR Document Server  
**To:** LEGAL.ENFPO.MHALL  
**Date:** 9/18/97 2:09pm  
**Subject:** Retrieve Request: 5 = 32768 -Reply

Based on your request to GET "(5 = 32768) ",  
The nsr document management system has located the following document(s):

Dataset: ANSRP01

Doc #	Date Created	Author	DocType	App	Permit #	Record #
125400	01/03/97	KHAUER	TRV	WPWIN	32768	43911
Hercules Marine Services						
125109	12/24/96	KHAUER	C7	WPWIN	32768	43911
Hercules Marine Services Corp C7						
123907	12/06/96	KHAUER	C29B	WPWIN	32768	43911
C29B - HERCULES MARINE SERVICES CORPORATION						
120686	10/18/96	KHAUER	C29A	WPWIN	32768	43911
C29A - HERCULES MARINE SERVICES CORPORATION						
115904	08/14/96	KHAUER	C29A	WPWIN	32768	43911
C29A - HERCULES MARINE SERVICES CORPORATION						
114285	07/25/96	KHAUER	PN	WPWIN	32768	43911
hercules Marine services						
112885	07/05/96	KHAUER	PN	WPWIN	32768	43911
PN - HERCULES MARINE SERVICES CORPORATION						
112884	07/05/96	KHAUER	C26	WPWIN	32768	43911
C26 - HERCULES MARINE SERVICES CORPORATION						
108554	06/11/96	SRAJAGOP	C33	WPWIN	32768	43911
C33 - HERCULES MARINE SERVICES CORPORATION						



**Withdrawal**  
**TECHNICAL REVIEW**

Permit No: **32768**  
Project Type: **Withdrawal**  
City: **Freeport**  
Record No: **43911**  
Account No: **BL-0118-V**

Company: **Hercules Marine Services**  
Facility Name: **Barge Cleaning and Repair**  
County: **Brazoria**

**AUTHORIZATION CHECKLIST** (any "Yes" requires signature by Executive Director):

Will a new policy/precedent be established? **No**  
Was at least one public hearing request received? **No**  
If yes, was/were all the request(s) withdrawn? **No**  
Is a state or local official opposed to the permit? **No**  
If yes, please provide name and title of official.  
Is waste or tire derived fuel involved? **No**  
Are waste management facilities involved? **No**

**PROJECT OVERVIEW**

Hercules Marine Services requested withdrawal of their application for a construction permit on December 12, 1996. Hercules was issued a standard permit on November 12, 1996 for a vapor combustor unit and they no longer need this permit. No permit is needed because the facility retains its grandfathered status.

Permit Engineer  
Date

Date

Team Leader/Section Manager/Backup

000710

January 3, 1997

Mr. Thomas E. Hord  
Vice President  
Hercules Marine Services Corporation  
906 Marlin  
Freeport, Texas 77541

Re: Permit Application  
Permit No. 32768  
Barge Cleaning and Repair  
Freeport, Brazoria County  
Account ID No. BL-0118-V

Dear Mr. Hord:

As you requested in your application withdrawal letter dated December 12, 1996, we are voiding the active Permit Application File No. 32768. We understand that the facility retains its grandfathered status and therefore does not require a permit at this time.

All records regarding this application will be retained in case you should wish to reactivate the project in the future; however, any future reactivation will require that you reapply under the requirements of 30 TAC Chapter 116 in effect at that time.

Thank you for informing us of the status of this application.

Sincerely,

Victoria J. L. Hsu, P.E.  
Director  
New Source Review Division

VH/kh/jb

000711

cc: Ms. Karen Atkinson, Acting Regional Manager, Houston  
Harry Walker, Ph.D., Walker, H. M. & Associates, Dickinson

000712

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

HARRY WALKER PHD  
WALKER H M & ASSOCIATES  
3321 EAST BAYOU DR  
DICKINSON TX 77539

000713

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

MR THOMAS E HORD  
VICE PRESIDENT  
HERCULES MARINE  
SERVICES CORPORATION  
906 MARLIN  
FREEPORT TX 77541

000714

December 10, 1996

Mr. Thomas E. Hord  
Vice President  
Hercules Marine Services Corporation  
906 Marlin  
Freeport, Texas 77541

Re: Permit Application  
Permit No. 32768  
Barge Cleaning and Repair  
Freeport, Brazoria County  
Account ID No. BL-0118-V

Dear Mr. Hord:

We received the above-referenced permit application. We subsequently determined that additional information was necessary and requested this information by letter dated November 1, 1996 (copy enclosed). Please be advised that we have not received a satisfactory reply.

After receipt of all the additional information, we will continue the review of your application. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible. You are reminded that 30 TAC Section 116.116(a) (Regulation VI) states that all representations made in a permit application become conditions upon which a permit is issued. Any variations from these representations require prior authorization from the Texas Natural Resource Conservation Commission.

Failure to submit all the requested information within 15 days of the date of this letter will result in the administrative voidance of your application. Following an administrative voidance, your application and supporting data, as well as any fees submitted, will be retained for 180 days. To reactivate the voided application, please submit a new PI-1 application form and all the information requested above. Additional fees need not be submitted if the project scope has not increased and the original fee was correct. If all these conditions are not satisfied within 180 days from the date of the voidance, your application will automatically be

000715

denied and the entire application, including the appropriate fee, must be resubmitted if you desire to pursue the project.

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact me at (512) 239-1372.

Sincerely,

Katherine C. Hauer *2/372*  
Chemical Section  
New Source Review Division  
Texas Natural Resource Conservation Commission

KH/ms

Enclosure

cc: Ms. Karen Atkinson, Air Program Manager, Houston  
Mr. Leo D. O'Gorman, M.D., Director, Brazoria County Health Department, Angleton  
Dr. H. M. Walker, H. M. Walker & Associates, Inc., Dickinson

000716

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

MR THOMAS E HORD  
VICE PRESIDENT  
HERCULES MARINE  
SERVICES CORP  
906 MARLIN  
FREEPORT TX 77541

000717



New Source Review, Office of Air Quality - 7200/MC-162/MLC1

DR H M WALKER  
H M WALKER & ASSOCIATES  
3321 E BAYOU DR  
DICKINSON TX 77539

000718

November 1, 1996

Mr. Thomas E. Hord  
Vice President  
Hercules Marine Services Corporation  
906 Marlin  
Freeport, Texas 77541

Re: Permit Application  
Permit No. 32768  
Barge Cleaning and Repair  
Freeport, Brazoria County  
Account ID No. BL-0118-V

Dear Mr. Hord:

This will acknowledge receipt of your application for the above-referenced permit. We have determined that your application is deficient, and additional information is needed to enable us to continue with our review. Please furnish the information indicated as follows:

1. Provide calculations for the degassing of barges. Speciate emissions from the combustor for each compound. Provide emission rates on Table 1a. These emissions need to be modeled to assess the on-shore impacts.
2. Provide a chemical list of all of the compounds that the barges will contain before being cleaned. This list will be included with the permit.
3. How are the vapors from the carbon canisters checked to ensure breakthrough has not occurred? Emissions from carbon canisters should be based on a breakthrough definition of 100 ppmv or less. Emission calculations can be found in the Carbon Adsorption Systems Standardization Package. Include speciated emissions on the Table 1a.

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4. The carbons adsorption system represented in the application consists of two carbon canisters. This system is appropriate for controlling no more than two compounds at a time. For venting three or more compounds at a time, a minimum of three carbon canisters connected in series is required. Describe the emissions that will be vented to the carbon adsorption system.
5. The fugitive emissions are not represented in this application. Calculate the fugitive emissions according to the appropriate monitoring program found in the Equipment Leak Fugitives Standardization Package. Include these speciated emissions on the Table 1a.
6. There are no tank truck emissions for the recovered materials listed on the Table 1a. Explain the tank truck loading operations including the type of truck and type of connection used during the loading operation. The maximum collection efficiency associated with a vacuum truck is 95 percent depending upon the type of connections used. Provide tank truck loading emissions for this operation. Include these emissions on the Table 1a.

After receipt of all the additional information, we will continue the review of your application. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible. You are reminded that 30 TAC Section 116.116(a) (Regulation VI) states that all representations made in a permit application become conditions upon which a permit is issued. Any variations from these representations require prior authorization from the Texas Natural Resource Conservation Commission.

Failure to submit all the requested information within 30 days of the date of this letter may result in the administrative voidance of your application. Following an administrative voidance, your application and supporting data, as well as any fees submitted, will be retained for 180 days. To reactivate the voided application, a new PI-1 application form and all the information requested above will be required. Additional fees need not be submitted if the project scope has not increased and the original fee was correct. If all these conditions are not satisfied within 180 days from the date of the voidance, your application will automatically be denied and the entire application, including the appropriate fee, must be resubmitted if you desire to pursue the project.

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact me at (512) 239-1372.

Sincerely,

Katherine C. Hauer  
Chemical Section  
New Source Review Division  
Texas Natural Resource Conservation Commission

KH/ms

cc: Ms. Karen Atkinson, Air Program Manager, Houston  
Mr. Rob Barrett, Director, Harris County Pollution Control Department, Pasadena  
Dr. H. M. Walker, H. M. Walker & Associates, Inc., Dickinson

000721

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

MR THOMAS E HORD  
VICE PRESIDENT  
HERCULES MARINE  
SERVICES CORPORATION  
906 MARLIN  
FREEPORT TX 77541

000722

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

DR H M WALKER  
H M WALKER & ASSOCIATES  
INC  
3321 E BAYOU DR  
DICKINSON TX 77539

000723

New Source Review, Office of Air Quality - 7200/MC-162/MLC1

DR H M WALKER  
H M WALKER & ASSOCIATES INC  
3321 E BAYOU DR  
DICKINSON TX 77539

000724

August 19, 1996

Mr. Thomas E. Hord  
Vice President  
HERCULES MARINE SERVICES  
CORPORATION  
906 Marlin  
Freeport, Texas 77541

Re: Permit Application  
Permit No. 32768  
Barge Cleaning and Repair  
Freeport, Brazoria County  
Account ID No. BL-0118-V

Dear Mr. Hord:

This will acknowledge receipt of your application for the above-referenced permit. We have determined that your application is deficient, and additional information is needed to enable us to continue with our review. Please furnish the information indicated as follows:

1. Provide a Material Safety Data Sheet (MSDS) for each compound used including sand, black beauty sand, and the paint used.
2. I cannot understand the section entitled "Fraction Airborne from Black Beauty" from the calculation of sandblasting emissions. Please explain this calculation.
3. Best available control technology (BACT) for sandblasting was not included. BACT for sandblasting includes:
  1. No use of silica sand.
  2. A shroud 15 feet higher than the item being blasted.

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Please address this issue.

After receipt of all the additional information, we will continue the review of your application. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible. You are reminded that 30 TAC Section 116.116(a) (Regulation VI) states that all representations made in a permit application become conditions upon which a permit is issued. Any variations from these representations require prior authorization from the Texas Natural Resource Conservation Commission.

Failure to submit all the requested information within 30 days of the date of this letter may result in the administrative voidance of your application. Following an administrative voidance, your application and supporting data, as well as any fees submitted, will be retained for 180 days. To reactivate the voided application, a new PI-1 application form and all the information requested above will be required. Additional fees need not be submitted if the project scope has not increased and the original fee was correct. If all these conditions are not satisfied within 180 days from the date of the voidance, your application will automatically be denied and the entire application, including the appropriate fee, must be resubmitted if you desire to pursue the project.

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact me at (512) 239-1372.

Sincerely,

Katherine C. Hauer  
Chemical Section  
New Source Review Division  
Texas Natural Resource Conservation Commission

KC/ms

cc: Ms. Karen Atkinson, Air Program Manager, Houston  
Mr. H. M. Walker, PhD., Environmental Consultant, Dickinson,

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New Source Review, Office of Air Quality - 7200/MC162/MLC1

MR H M WALKER PHD  
ENVIRONMENTAL  
CONSULTANT  
3321 E BAYOU DR  
DICKINSON TX 77539

000727

New Source Review, Office of Air Quality - 7200/MC162/MLC1

MR THOMAS E HORD  
VICE PRESIDENT  
HERCULES MARINE  
SERVICES  
CORPORATION  
906 MARLIN  
FREEPORT TX 77541

000728

**PERMISO DE CONSTRUCCION**  
**A TODAS LAS PERSONAS Y ENTIDADES INTERESADAS:**

Por el presente se les notifica que **THE DAVIS COMPANY** ha solicitado un Permiso de Calidad de Aire Número **27589** de la Comisión de Conservación de Recursos Naturales de Tejas (TNRCC o Texas Natural Resource Conservation Commission). Si se aprueba este permiso, se autorizará la construcción de una **Reparacion de Vehiculos en Red Oak**, condado de **Ellis**, Tejas. El sitio de la planta existente es **906 Marlin**. Esta planta va a emitir los siguientes contaminantes atmosféricos: óxidos de nitrógeno, monóxido de carbono, materia en partículas, óxidos de azufre, y compuestos de carbono.

Una copia de todos los materiales en el archivo público puede ser inspeccionada o copiada en la oficina regional del TNRCC **Houston Regional Office, Air Program at 5425 Polk Street, Suite H, Houston, Texas 77023-1423, telephone (713) 767-3500**, y en la oficina central del TNRCC, Oficina de Calidad de Aire, 12100 Park 35 Circle, Edificio C, Austin, Tejas 78753, teléfono (512) 239-1000. Los archivos del cumplimiento de las leyes de la planta, si existen, pueden ser evaluados por el público en la oficina regional del TNRCC. Cualquier información relacionada a la solicitud o a cualquiera de sus aspectos técnicos puede obtenerse escribiendo a **Ms. Kate Hauer**, TNRCC Office of Air Quality New Source Review Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087 en Austin o a la oficina regional del TNRCC en **Houston**.

Usted puede enviar comentarios escritos con respecto a esta solicitud de permiso a la Oficina de Calidad de Aire, División de Revisión de Fuentes Nuevas en Austin. Todos los comentarios escritos recibidos durante los 30 días después de la publicación de este aviso serán considerados por el Director Ejecutivo del TNRCC para determinar si se otorga o no el permiso. Todos los comentarios escritos estarán disponibles para inspección del público en la Oficina de Calidad de Aire en la Oficina Central del TNRCC en Austin. Este aviso se publicará en   (a)  \* y en   (b)  \*.

Cualquier persona que pueda ser afectada por las emisiones de contaminantes atmosféricos de la planta propuesta puede solicitar que la Comisión lleve a cabo una reunión pública informal y/o una audiencia en controversia sobre la solicitud de acuerdo a la sección 382.056(d) del Código de Salud y Seguridad de Tejas. La Comisión no está obligada a llevar a cabo una audiencia en controversia si se considera que las bases de la petición son irracionales. Todas las peticiones para audiencia en controversia deben ser recibidas por escrito dentro de los 30 días del período de comentarios aunque se haya celebrado o planeado una reunión pública informal sobre este asunto. Si usted desea solicitar una audiencia pública, deberá someter su solicitud por escrito. Usted debe proporcionar su (1) nombre, dirección postal y número de teléfono durante el día; (2) el número del permiso u otra referencia apropiada a esta solicitud; (3) la oración en inglés "I/we request a public hearing"; (4) una descripción breve de como al

otorgar el permiso se le perjudicaría a usted o a las personas que usted representa; (5) una descripción de la posición de su propiedad en relación a las operaciones del solicitante; y (6) su propuesta de como ajustar el permiso de forma que se responda a sus inquietudes para que usted pueda retirar su petición de una audiencia. Peticiones para una audiencia pública deben ser enviadas por escrito a Office of the Chief Clerk (MC-105), Texas Natural Resource Conservation Commission, P.O. Box 13087, Austin, Texas 78711-3087, teléfono (512) 239-3300.

Para que el permiso sea otorgado a esta planta, el solicitante debe demostrar que todas las fuentes de contaminantes cumplen con las reglas y reglamentos de calidad de aire del TNRCC y los reglamentos aplicables del gobierno Federal. Esto incluye la aplicación de "la Mejor Tecnología de Control Disponible" (BACT o Best Available Control Technology) para cada fuente de emisiones nueva o modificada y cumplimiento de todas las normas relacionadas a la calidad del aire.

\* see "Example A NOTES"

Note: Insert the dates of publication in blanks (a) and (b) if this notice will be published twice. Delete the sentence if this notice will be published only once. Bolded text highlights critical information; however, bolded fonts are not required in the newspaper print.

TNRCC Construction PermitExample A  
const-s.pnRevised 05/10/96

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Publication Elsewhere in the Newspaper

A TODAS LAS PERSONAS Y ENTIDADES INTERESADAS:

**THE DAVIS COMPANY** ha hecho solicitud a la Comisión de Conservación de Recursos Naturales de Tejas (TNRCC o Texas Natural Resource Conservation Commission) para el permiso Núm. **27589** para construir una **Reparacion de Vehiculos en Red Oak, Condado de Ellis**, Tejas. La dirección de la planta **existente** es **906 Marlin**. Mas información con respecto a esta solicitud se encuentra en la sección de avisos públicos de esta publicación. Este aviso se publicará en (a)\* y en (b)\*.

\* see "Example B NOTES"

Note: Insert the dates of publication in blanks (a) and (b) if this notice will be published twice. Delete the sentence if this notice will be published only once. Bolded text highlights critical information; however, bolded fonts are not required in the newspaper print.

## Example C

# SIGN POSTING

Sign(s) must be in place on day of publication of first newspaper notice and must remain in place and be legible for the 30-day public comment period (which begins on the last day of newspaper publication). Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a street or other public thoroughfare. Signs must be spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public thoroughfare.

← 18" minimum →

Section A



Section B →

Section C →

Section D





Section E →

↑ Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100% visible from street.

**Publication in the Public Notice Section of the Newspaper**

**TO ALL INTERESTED PERSONS AND PARTIES:**

You are hereby notified that **HERCULES MARINE SERVICES CORPORATION** has applied for Texas Natural Resource Conservation Commission (TNRCC) Air Quality Permit No. **32768**. This permit, if approved, will authorize construction of a **Facility in Freeport, Brazoria County, Texas**. The location of the existing facility is **906 Marlin**. This facility will emit the following air contaminants: **carbon monoxide, oxides of nitrogen, sulfur dioxide, particulate matter, and hydrocarbons**.

A copy of all materials in the public file is available for inspection and reproduction at the **TNRCC Houston Regional Office, Air Program at 5425 Polk Street, Suite H, Houston, Texas 77023-1423, telephone (713) 767-3500**, and at the TNRCC Central Office, 12100 Park 35 Circle, Austin, Texas 78753, telephone (512) 239-1000. The facility's compliance file, if any exists, is available for public review in the Regional Office of the TNRCC. Inquiries about the permit application and any information concerning any technical aspect of this application can be obtained by writing **Ms. Kate Hauer**, TNRCC Office of Air Quality, New Source Review Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087 or the **TNRCC Houston Regional Office**.

You may submit written comments concerning the permit application to the TNRCC Office of Air Quality, New Source Review Division in Austin. All written comments received within 30 days after the second publication of this notice shall be considered by the TNRCC Executive Director in determining whether to issue or not issue the permit. All written comments will be made available for public inspection at the TNRCC Central Office in Austin. This notice is to be published on (a)\* and (b)\*.

Any person who may be affected by emissions of air contaminants from the proposed facility may request the Commission to hold an informal public meeting and/or contested case hearing on the permit application pursuant to Section 382.056(d) of the Texas Health and Safety Code. The Commission is not required to hold a contested case hearing if the basis of a request is determined to be unreasonable. All requests for a contested case hearing must be received in writing within the 30-day comment period regardless of whether an informal public meeting has been held or scheduled on this matter. If you wish to request a public hearing, you must submit your request in writing. You must state (1) your name, mailing address, and daytime phone number; (2) the permit number or other recognizable reference to this application; (3) the statement "I/we request a public hearing"; (4) a brief description of how you, or the persons you represent, would be adversely affected by the granting of the application; (5) a description of the location of your property relative to the applicant's operations; and (6) your proposed adjustment to the application/permit which would satisfy your concerns and cause you to withdraw your request for hearing. Requests for a public hearing on this application should be submitted in writing to Office of the Chief Clerk (MC-105), Texas Natural Resource Conservation Commission, P.O. Box 13087, Austin, Texas 78711-3087, telephone (512)

239-3300.

Before a permit can be issued for this facility, the applicant must demonstrate that all emission sources are in compliance with all TNRCC air quality rules and regulations and all applicable Federal regulations. This includes the application of "best available control technology" to each new or modified emission source and compliance with all ambient air quality standards.

see "EXAMPLE A NOTES"

Notes: Insert the dates of publication in blanks (a) and (b) if this notice will be published twice. Delete the sentence if this notice will be published only once. Bolded text highlights critical information; however, bolded fonts are not required in the newspaper print.

TNRCC construction permitEXAMPLE A  
const.pnRevised 1/96

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Publication Elsewhere in the Newspaper

TO ALL INTERESTED PERSONS AND PARTIES:

**HERCULES MARINE SERVICES CORPORATION** has made application with the Texas Natural Resource Conservation Commission for Air Quality Permit No. **32768** to construct a **Facility in Freeport, Brazoria County, Texas**. The location of the **existing** facility is **906 Marlin**. Additional information concerning this application is contained in the public notice section of this newspaper. This notice is to be published on (a)\* and (b)\*.

\*see "EXAMPLE B NOTES"

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Notes: Insert the dates of publication in blanks (a) and (b) if this notice will be published twice.  
Delete the sentence if this notice will be published only once. Bolded text highlights critical  
information; however, bolded fonts are not required in the newspaper print.

TNRCC Construction permitEXAMPLE B  
const.pnRevised 1/96

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## NOTIFICATION LIST AND CERTIFICATION FORM

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, a completed copy of any Publishers' Affidavits required (example enclosed), a completed copy of the Bilingual Notice Certification Form, and a completed copy of the sign certification found at the bottom of this page. Originals should be sent to the TNRCC Office of Air Quality, New Source Review Division in Austin.

Environmental Protection Agency  
Regional Administrator  
Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Ms. Karen Atkinson, Manager  
Air Program  
TNRCC Region No. 12  
5425 Polk Street, Suite H  
Houston, Texas 77023-1423

Texas Natural Resource  
Conservation Commission  
Office of Air Quality  
New Source Review Division (MC-162)  
Ms. Kate Hauer  
P.O. Box 13087  
Austin, Texas 78711-3087

Leo D. O'Gorman, M.D., Director  
Brazoria County Health Department  
432 East Mulberry  
Angleton, Texas 77515

I certify that the signs required by Title 30 Texas Administrative Code, Section 116.133 were posted in accordance with the provisions of that section. I also certify that copies of the notices and the requested certifications have been furnished to the above listed offices in accordance with §116.134.

Signed by:  
Title:  
Company:  
Date:

cert.pnRevised 1/96

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ATTENTION: BILINGUAL NOTICE REQUIREMENTS FOR

## PERMITS

Title 30 Texas Administrative Code Sections 116.132(c) and 116.133(f) require public notice in each alternate language for which a bilingual educational program at the elementary or middle school nearest the facility is required under the Education Code Section 21.109 and the Title 19 Texas Administrative Code Section 89.2(a).

Bilingual public notification rules require determining whether an applicable program exists at either the elementary or middle school nearest to the proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are enrolled in a bilingual education program, §116.132(c) and §116.133(f) apply. Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the above-mentioned schools.

Section 116.132(c) requires publication of alternate language newspaper notices in a newspaper or publication of general circulation. Publications of alternate language notices must be made in a newspaper or publication printed in each language taught in the bilingual education program, if such a newspaper or publication exists in the municipality or the county where the facility is or will be located. If a general circulation newspaper or publication printed in such language cannot be found, publishing in that language is not required. Publication in an alternate language section or insert within a large publication which is not printed primarily in that alternate language does not satisfy these requirements. **Notice must be published in two consecutive issues if the newspaper is published once a week or more frequently. Otherwise, only one publication is required.**

Section 116.133(f) requires posting of alternate language signs if a bilingual education program is required at the elementary or middle school nearest the facility. A sign in each such language should be posted adjacent to each English language sign. **It is important to note that, if sign posting is required under §116.133(f), the signs must be posted even if the publishing required under §116.132(c) could not be done.**

The applicant has the burden to demonstrate compliance with §116.132(c) and §116.133(f). To satisfy this burden, the applicant must:

A. Certify that either:

- (1) A diligent search found that there are no bilingual educational program requirements; or
- (2) A bilingual educational program is required; and

B. If a bilingual educational program is required, the applicant must:

- (1) Certify which languages are required in the program and post signs in those languages, and
- (2) Publish notices in each of those languages and provide copies of the required publications in each language; or
- (3) Certify the applicant conducted a diligent search and:
  - a. Found no appropriate newspapers or publications in the specified languages; or
  - b. The applicant found appropriate newspapers or publications, but the publisher(s) of the newspapers refused to publish notice, (the applicant must specify which newspaper or publication refused to publish notice).



It is suggested the applicant work with the local school district to do the following:

- (a) determine if a bilingual program is required in the district;
- (b) locate the nearest elementary and middle schools;
- (c) determine if any students required to attend either school are enrolled in a bilingual educational program; and
- (d) which languages are utilized by the students enrolled in the program.

**\*Public notice examples in Spanish are available from the permit engineer upon request.**

Binotice.pn Revised 1/5/96

## BILINGUAL NOTICE CERTIFICATION FORM

I certify that, by signifying answers with initials: Initials

- (a) I have contacted the appropriate school district, and a bilingual program  
exists in the district; \_\_\_\_\_

or, I have contacted the appropriate school district, and NO bilingual program  
exists in the district \_\_\_\_\_

School District: \_\_\_\_\_

Contacted: \_\_\_\_\_

Date: \_\_\_\_\_

- (b) The name of the elementary school nearest to the proposed facility is:  
\_\_\_\_\_

- (c) The name of the middle school nearest to the proposed facility is:  
\_\_\_\_\_

- (e) Students who are required to attend one of the schools above are enrolled in a  
bilingual program provided by the district: \_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_

- (f) The following language(s) is/are utilized by students enrolled in the program:  
\_\_\_\_\_  
\_\_\_\_\_

Signed by:  
Title:

Company:  
Date:

If an applicable bilingual program exists, post signs and publish notice as outlined in "Bilingual Notice Requirements."

\* I certify that the alternate language signs were posted as required in 30 TAC §116.133(f).

Signed by:

Company:

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Title:

Date:

\* I certify that the company conducted a diligent search for a newspaper or publication of general circulation in the municipality or county in which the facility is located or proposed to be located and that no such newspaper or publication was found in any of the following languages in which notice is required: \_\_\_\_\_

Signed by:  
Title:

Company:  
Date:

\* I certify that the publishers of the following newspapers have refused to publish notice as requested, and no other newspaper or publication in the same language and of general circulation was found in the municipality or county in which the facility is located or proposed to be located:

Newspaper:  
Signed by:  
Title:

Language:  
Company:  
Date:

Binotice.pnRevised 1/5/96

000743

Mr. Thomas E. Hord  
Vice President  
HERCULES MARINE SERVICES  
CORPORATION  
906 Marlin  
Freeport, Texas 77541

Re: Permit Application  
Permit No. 32768  
Barge Cleaning and Repair Facility  
Freeport, Brazoria County  
Account ID No. BL-0118-V

Dear Mr. Hord:

Your application for a permit application is under review. The Texas Clean Air Act and 30 TAC Section 116.131 (Regulation VI) require that you provide public notification as follows:

1. Publish information required by §116.132(a) and (b) in two successive issues of a newspaper of general circulation in the municipality nearest where the facility is to be located; refer to the enclosed Examples A and B;
2. Post notice at the proposed site in accordance with §116.133; refer to the enclosed Example C;
3. Provide copies of the publication to agencies and certify that signs have been posted in accordance with §116.134; refer to the enclosed Notification List and Certification Form; and
4. You may also be required to publish notice in an alternate language newspaper and post signs in an alternate language; refer to the enclosed Bilingual Notice Requirements and Bilingual Notice Certification form. Spanish versions of

Examples A, B, and C are available upon request by contacting the project engineer referenced below.

Please proceed with these notification procedures within two weeks. Failure to proceed and furnish copies of correct publications to the Texas Natural Resource Conservation Commission and other agencies can result in your application being voided.

If you have any questions concerning these requirements, please contact Ms. Kate Hauer of the Office of Air Quality, New Source Review Division at (512) 239-1372.

Sincerely,

Dan Pearson  
Executive Director  
Texas Natural Resource Conservation Commission

DP/KH/bg

Enclosures

cc: Ms. Karen Atkinson, Air Program Manager, Houston  
Ms. Gloria Vasquez, Chief Clerk, Austin

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New Source Review, Office of Air Quality - 7200/MC162/MLC1

MR THOMAS E HORD  
VICE PRESIDENT  
HERCULES MARINE SERVICES CORPORATION  
906 MARLIN  
FREEPORT TX 77541

000747

June 18, 1996

Mr. Thomas E. Hord  
Vice President  
HERCULES MARINE SERVICES  
CORPORATION  
906 Marlin  
Freeport, Texas 77541

Re: Administrative Review  
Permit Application  
Permit No. 32768  
Barge Cleaning and Repair  
Freeport, Brazoria County  
Account ID No. BL-0118-V

Dear Mr. Hord:

This is in response to your application received on June 4, 1996, and to acknowledge receipt of your permit fee in the amount of \$450.00.

We have completed our initial review and find that there is sufficient information to declare your application administratively complete.

Accordingly, your request has been referred to the New Source Review **Chemical** Section for technical evaluation and review under 30 Texas Administrative Code Chapter 116.

**Unless otherwise notified, it will expedite the handling of your request if you will now direct all communications regarding this matter to Ms. Kate Hauer, who has been assigned as the project engineer. To further expedite review, you are welcome to fax the requested information to the above engineer at (512) 239-1300.**

Please note that this letter does not represent a technical review of your application, but rather

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determines that sufficient information has been submitted to justify the start of the technical review. Please be aware that the technical review and evaluation may result in requests for additional information (see the enclosed **Technical Completeness Guidelines**). You will be contacted if additional information is required to complete the review.

Please remember that all of the information which you submit, whether on paper or in electronic form, will become part of the public record unless it is clearly marked as confidential. If you submit any proprietary information, please make certain that it is marked confidential and is separated from the non-confidential information. Please make a reference to the account ID number of your facility (**shown in the reference block in this letter**) in all correspondence with this office and all TNRCC Regional Offices.

If you have any further questions concerning this matter, please contact the designated project engineer at (512) 239-1372.

Sincerely,

Sridharan Raj  
CORE Section  
New Source Review Division  
Texas Natural Resource Conservation Commission

SR/ms

Enclosures

cc: Ms. Karen Atkinson, Air Program Manager, Houston  
Mr. Leo D. O'Gorman, M.D., Director, Brazoria County Health Department, Angleton

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# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

## TECHNICAL COMPLETENESS GUIDELINES

Submitting an administratively complete application is a necessary first step toward getting your permit or amendment approved. The application must also be technically complete and correct before it can be sent forward for approval. Because of the wide variety of permit types and the case-by-case nature of the permit review process, it is impossible to specify what is required for technical completeness for every application. However, an understanding of the technical review process will help you to determine what information will be needed for your application to be declared technically complete.

There are three major parts to the technical review process. The first part of the review verifies that all **emission sources** have been identified and the **emission rates** have been correctly calculated. The permit engineer uses some or all of the following information to complete this part of the review: process description, process flow chart, Table 1(a), material usage rates table, Material Safety Data Sheets (MSDS), and the emission calculations.

After the emission sources have been identified and evaluated, the permit engineer begins reviewing the proposed control technology. The application of the **best available control technology** (BACT) for all permitted emission sources is required by 30 Texas Administrative Code Section 116.111(3).

Once the TNRCC and the applicant agree on the appropriate controls for the facility, an off-property **impacts analysis** is performed for all emission sources. A computer-based mathematical model is used to predict the off-property impacts (concentrations) for each air contaminant. The permit engineer may require the applicant to perform dispersion modeling based on the proposed emissions from the facility. The TNRCC Modeling Section has established modeling protocol and **must** be consulted before any official modeling is performed. The predicted off-property concentrations of the proposed emissions may be submitted to the TNRCC Toxicology and Risk Assessment Section for a toxicological review.

For new permits and substantial modifications to existing permits, the permit engineer may require the applicant to have two **public notice** advertisements published in a newspaper with local circulation and post signs at the facility site for a 30-day public comment period while a 15 day period may be required for permit renewals. During the comment period, the public has the right to request an informal public meeting or contested case hearing concerning the application.

When all of the issues described above have been resolved, the permit engineer will draft the **permit special conditions** for review and comment by the applicant. The regional office of the TNRCC and local programs with jurisdiction over the facility also review, comment on, and sometimes suggest changes to these draft special conditions. Once all parties agree on the permit special conditions, the new or amended permit is issued.

5/95

000751

New Source Review, Office of Air Quality - 7200/MC162/MLC1

MR THOMAS E HORD  
VICE PRESIDENT  
HERCULES MARINE  
SERVICES CORP  
906 MARLIN  
FREEPORT TX 77541

000752

**From:** Miriam Hall  
**To:** mturner  
**Date:** 9/18/97 2:12pm  
**Subject:** Retrieve Request: 5 = 32768 -Reply -Forwarded

000753

**From:** NSR Document Server  
**To:** LEGAL.ENFPO.MHALL  
**Date:** 9/18/97 2:09pm  
**Subject:** Retrieve Request: 5 = 32768 -Reply

Based on your request to GET "(5 = 32768) ",  
The nsr document management system has located the following document(s):

Dataset: ANSRP01

Doc #	Date Created	Author	DocType	App	Permit #	Record #
125400	01/03/97	KHAUER	TRV	WPWIN	32768	43911
Hercules Marine Services						
125109	12/24/96	KHAUER	C7	WPWIN	32768	43911
Hercules Marine Services Corp C7						
123907	12/06/96	KHAUER	C29B	WPWIN	32768	43911
C29B - HERCULES MARINE SERVICES CORPORATION						
120686	10/18/96	KHAUER	C29A	WPWIN	32768	43911
C29A - HERCULES MARINE SERVICES CORPORATION						
115904	08/14/96	KHAUER	C29A	WPWIN	32768	43911
C29A - HERCULES MARINE SERVICES CORPORATION						
114285	07/25/96	KHAUER	PN	WPWIN	32768	43911
hercules Marine services						
112885	07/05/96	KHAUER	PN	WPWIN	32768	43911
PN - HERCULES MARINE SERVICES CORPORATION						
112884	07/05/96	KHAUER	C26	WPWIN	32768	43911
C26 - HERCULES MARINE SERVICES CORPORATION						
108554	06/11/96	SRAJAGOP	C33	WPWIN	32768	43911
C33 - HERCULES MARINE SERVICES CORPORATION						

000754

- ☐ Add  
☐ Change  
☐ Delete

☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
 White - Region/Local Program  
 Canary - Data Entry/Region  
 Pink - Investigator/Data Entry

# TNRCC INVESTIGATION/VIOLATION FORM

(Boldfaced items are required)

5/11/96

Account Number <u>BLO118 V</u>		Account Name <u>Hercules Marine Services Corp.</u>	
Date of Investigation (as MMDDYY) <u>3/28/96</u>		Off Hours: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
1	Investigator Staffcode <u>CLH</u>	Permit(s) _____	
Primary Investigator Juriscode <u>120</u>		Other Juriscode 1 _____ Other Juriscode 2 _____	
Site Name/Location <u>906 Martin, Freeport, Brazoria County</u>			
Person Contacted/Phone <u>Larry Ballinger</u>		<u>409-233-6371</u>	
Investigation Number <u>073035 A</u>		Related Previous Investigation Number _____	
Federal Program: <input type="checkbox"/> Yes <input type="checkbox"/> No		NSPS: <input type="checkbox"/> Yes <input type="checkbox"/> No NESHA: <input type="checkbox"/> Yes <input type="checkbox"/> No Situation Number _____	
Investigation Type <u>COSV</u>		In-House Investigation: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No *EPN	
2	Comment <u>Complaint No. 129600443 was investigated and unconfirmed for sandblasting nuisance, see report.</u>		
<p>FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY</p> <p>Date Test Conducted (as MMDDYY) _____ Date Report Received (as MMDDYY) _____</p> <p>Analysis Review Results (C,N,U) _____ Permits(s) _____ Retest Required: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>			
Investigation Number <u>B</u>		Related Previous Investigation Number _____	
Federal Program: <input type="checkbox"/> Yes <input type="checkbox"/> No		NSPS: <input type="checkbox"/> Yes <input type="checkbox"/> No NESHA: <input type="checkbox"/> Yes <input type="checkbox"/> No Situation Number _____	
3	Investigation Type <u>FILE</u> In-House Investigation: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No *EPN		
Comment <u>File review conducted to determine applicable standard exemptions and Grandfathered status.</u>			
Investigation Number _____		Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Violation Number _____ (changes/deletes only)		Situation Number _____ (Compliance Div. only)	
Cause/Description _____ (Compliance Div. only)		Contamcode _____	
4	Rule Violated _____		
Fill in the following applicable items:			
Permit Number _____		Permit Provision _____	
Board Order Number _____		Court Order Number _____ CFR Part _____	
* FIN Involved _____		Facility Name (optional) _____	
Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger		Date NOV Sent (as MMDDYY) _____	
Date NOV Received (as MMDDYY) _____		(defaults to 5 days after date NOV sent)	
Investigation Number _____		Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Violation Number _____ (changes/deletes only)		Situation Number _____ (Compliance Div. only)	
Cause/Description _____ (Compliance Div. only)		Contamcode _____	
4	Rule Violated _____		
Fill in the following applicable items:			
Permit Number _____		Permit Provision _____	
Board Order Number _____		Court Order Number _____ CFR Part _____	
* FIN Involved _____		Facility Name (optional) _____	
Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger		Date NOV Sent (as MMDDYY) _____	
Date NOV Received (as MMDDYY) _____		(defaults to 5 days after date NOV sent)	

- See back for valid codes and investigation type codes matrix
- EPN required for investigation types indicated on back with an \*
- FIN required for VOC violations as indicated with a + in the user's manual rule table

000755

Investigator signature Carol Narkin

Date 4/3/96

Approved by Jimmy R...

Date 4/30/96

7/08/96  
4:53 pm

TNRCC Investigation Printout

Media Type: A  
Investigator: CAROL HARKINS  
Investigation Date: 3/28/96  
Investigation No: 001425A  
TIN:  
Contact Date: 4/03/96  
Samples Sent:  
Site Visit: Y

Complaint No: 129600443 PSDB 073035A  
Time: 10:20  
CSN: 00024239  
Name: HERCULES REAL ESTATE CORPORATION  
SIC Code:  
Samples Returned:

Result of Investigation:

This complaint was unconfirmed for alleged sandblasting nuisance, see report.

Rule Violated:NO VIOLATION

Location:

906 Marlin

000756

7/08/96  
4:49 pm

TNRCC Complaint Printout - w/o Complainant Info

Media Type: A	Complaint No: 129600443	Assigned To CLH
Date Recvd: 3/20/96	Time Recvd: 11:30	Priority: 4
Complainant's Info		County 020 Brazoria
First/Last Name		Title/Org:
Address		
City, State, Zip		
Phone	Alt Phone:	Type Code: AR Effect: G

Initial Problem


Sandblasting activity from Hercules Marine Service without tarps is causing particulates residuals to settle all over property, e.g., pool, and patio furniture. Potential health problems by breathing these particulates.

#Complaining: 1	Date Occurred: 3/20/96	Form T:	Nature: D
Frequency: CURRENT	Confidential: Y	Referred By:	Referred To:

Date Complaint Notified of Commissioners Mtg/Formal Action:	Date of Formal Action:
--	---------------------------

Closure Comments

Closure Code: NVN	Closure Date: 4/03/96	Final Letter:
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Investigator

  
Region or Program Manager

7/11/96  
Date

Attachments(s): Correspondence \_\_\_\_\_  
Samples \_\_\_\_\_  
Photos \_\_\_\_\_  
Other \_\_\_\_\_

000757



Investigator's Comments  
Hercules Marine Services Corporation  
Freeport, Brazoria County  
Investigation No. 073035

BL-0118-V  
3/28/96  
Page 1


Purpose: Hercules Marine Services Corporation (HMS) was investigated on March 28, 1996 in response to complaint No. 129600443. This complaint was received on March 20, 1996, alleging a sandblasting nuisance. HMS is located at 906 Marlin, Freeport, Brazoria County.

Investigative Findings: This investigation was conducted at 10:20 am, with clear skies and winds from the northwest at 10 - 15 mph. The facility manager, Larry Ballinger, was informed of the complaint. Mr. Ballinger stated that the only sandblasting performed in March was on March 26, 1996, which was after the complaint was alleged. Records for sandblasting were reviewed and appeared to be complete, showing compliance with Standard Exemption (S.E.) 102. The sandblasting area was observed and Mr. Ballinger confirmed that Black Beauty sand is the only type of abrasive material used at the facility. No blasting was observed during the investigation. It appears that a northeast wind would be needed in order to impact the complainant's property.

While at HMS their painting records for January - March were reviewed for compliance with S.E. 75. Mr. Ballinger was informed that his records were not being kept in sufficient detail to show compliance with the exemption. On April 3, 1996 a fax was sent to Mr. Ballinger showing sample calculations in order to begin keeping more detailed records, see Attachment I. HMS appeared to be in compliance with the emission limits stated in S.E. 75 based on the material safety data sheet provided for the type of coating used over the last three months, see Attachment II.

The complainant was contacted prior to and after the investigation. Initially the complainant was contacted to obtain additional information pertaining to the complaint. On April 3, 1996 the complainant was informed of the results of the investigation. It was clarified that the sand on the complainant's property was not black and that the sand may have come from some other source. The complainant agreed to make more detailed observations and will notify TNRCC should the problem recur.

Conclusion: Complaint No. 129600443 was unconfirmed for nuisance conditions. No violations were documented during the investigation.

  
Carol Harkins  
EQS  
Region 12

000758


**TNRCC**

 Protecting Texas  
by Reducing and  
Preventing Pollution

# FAX TRANSMITTAL

DATE April 4, 1996

NUMBER OF PAGES (including this cover sheet):

10

TO: Name Larry Ballinger  
 Organization Hercules  
 FAX Number 409/233-6375

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION  
 Name Carol Harkins  
 Division/Region Air Program/Region 12  
 Telephone Number 713/767-3734  
 FAX Number 713/767-3761

## NOTES:

Larry:

In response to the investigation conducted on 3/28/96, I'm sending you the applicable Standard Exemption (S.E.) information for your facility as we discussed.

For sandblasting you are authorized under S.E. 102 for the year 1989 and it appears that your facility is in compliance with this exemption. In 1989 a Notice of Violation was issued for causing a sandblasting nuisance. The response letter sent by Hercules is enclosed and states that no blasting will occur with an easterly wind. Please be aware that you are bound to this agreement.

For surface coating you are authorized under S.E. 75 for the year 1989. As we discussed, your current recordkeeping procedures are not kept in sufficient detail to determine compliance with the 6.0 lb/hr VOC emission limit. From the information you provided, it appears that you are in compliance with the emission limits, however, the actual hours of painting are required in order to fully make this determination. An example of the required calculations is provided for your reference. If you have any questions, feel free to call me. The next time an investigator comes to your facility, these records will be reviewed for accuracy. You are not required to re-calculate the Jan. - Mar. records for this year, but to implement the more detailed recordkeeping procedures upon receipt of this fax.

Regarding Regulation V, the surface coating of marine vessels is exempt from the control requirements of 115.421(a)(9) in accordance with 115.427(a)(1)(C).

000759

Sample calculations for S.E. 75 using the epoxy primer coating MSDS you provided:

Date	Times	Coating	lb_voc/gal	gal_used	Total_voc	voc/hr.
4/2/96	9-11	primer	2.8	6	16.8	8.4
4/2/96	1-2	primer	2.8	1.5	4.2	4.2
4/2/96	2:30-4	primer	2.8	2.5	7	4.6

A mixed coating with 2.8 lb. voc/gal. means that you can use about 2 gal. of coating per/hr. This would emit 5.6 lb. voc/hr. keeping you under the 6.0 limit. Actual usage must then be averaged over a 4 hr. period. So you can use up to 8 gal. over any 4 hrs. or 8 gal. in the first hour without painting again for at least another 3 hrs. The voc emissions per unit of time are required to determine compliance, therefore, the exact hours and amounts must be recorded. Based on this example, using three different 4 hr. time periods, compliance is demonstrated as follows:

From 9-1, total voc emissions were 16.8.  $16.8 \text{ lb. voc} / 4 \text{ hrs.} = 4.2 \text{ lb. voc/hr.}$ , which is below the 6.0 lb./hr. limit.

From 1-5, total emission were  $7 + 4.2 = 11.2$ .  $11.2 / 4 \text{ hrs.} = 2.8 \text{ lb. voc/hr.}$

From 10-2, total emissions were  $4.2 \text{ (from 1-2)} + 8.4 \text{ (from 10-11)} = 12.6$ .  $12.6 / 4 = 3.15 \text{ lb. voc/hr.}$

Any 4 hour period average is below the 6.0 lb./hr. limit showing compliance with the S.E. Additionally, add together the total pounds of voc emitted per week to show that you are below the 500 lbs. per week limit.

Sincerely,

Carol Harkins

000760

- ☐ Add  
☐ Change  
☐ Delete

- ☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
 White - Region/Local Program  
 Canary - Data Entry/Region  
 Pink - Investigator/Data Entry

**TNRCC INVESTIGATION/VIOLATION FORM**  
 (Boldfaced items are required)

Account Number BL0118V Account Name Hercules Real Estate Corp  
 Date of Investigation (as MMDDYY) 03/14/96 Off Hours: ☐ Yes ☐ No  
 1 Investigator Staffcode RE01 Permit(s) \_\_\_\_\_  
 Primary Investigator Juriscode 120 Other Juriscode 1 \_\_\_\_\_ Other Juriscode 2 \_\_\_\_\_  
 Site Name/Location \_\_\_\_\_  
 Person Contacted/Phone \_\_\_\_\_

Investigation Number 073036A Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 • Investigation Type COSU In-House Investigation: ☐ Yes ☒ No \*\*EPN  
 2 Comment Complaint 129600920 unconfirmed. So sandblasting  
occurring during morning of 3/14/96.  
 >>> EDR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY <<<  
 Date Test Conducted (as MMDDYY) \_\_\_\_\_ Date Report Received (as MMDDYY) \_\_\_\_\_  
 Analysis Review Results (C,N,U) \_\_\_\_\_ Permits(s) \_\_\_\_\_ Retest Required: ☐ Yes ☐ No

Investigation Number \_\_\_\_\_ Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 3 • Investigation Type \_\_\_\_\_ In-House Investigation: ☐ Yes ☐ No \*\*EPN  
 Comment \_\_\_\_\_

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 4 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 \* FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 4 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 \* FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

- See back for valid codes and investigation type codes matrix.
- EPN required for investigation types indicated on back with an \*
- FIN required for VOC violations as indicated with a + in the user's manual rule table

000761

Investigator signature Rebecca S. Oll  
 Approved by J. W. [Signature]

Date 3/20/96  
 Date 4/30/96

5/13/96  
6:05 pm

TNRCC Complaint Printout - w/o Complainant Info

Media Type: A	Complaint No: 129600420	Assigned To REO
Date Recvd: 2/14/96	Time Recvd: 10:45	Priority: 4
Complainant's Info		County 020 Brazoria
First/Last Name		Title/Org:
Address		
City, State, Zip		
Phone	Alt Phone:	Type Code: AR Effect: G

Initial Problem

Hercules Marine Services company conducts sand blasting without using any tarpauline to contain sand dust. This is causing dust nuisance in the sub division in the vicinity.

#Complaining: 1	Date Occurred: 2/13/96	Form T:	Nature: D
Frequency: CURRENT	Confidential: Y	Referred By:	Referred To:

Date Complaint Notified of Commissioners Mtg/Formal Action:	Date of Formal Action:
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Closure Comments

Closure Code: NVN	Closure Date: 3/14/96	Final Letter:
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Rebecca E. Ohl  
Investigator

Larry P. ...  
Region or Program Manager

5/22/96  
Date

Attachments(s): Correspondence \_\_\_\_\_  
Samples \_\_\_\_\_  
Photos \_\_\_\_\_  
Other \_\_\_\_\_

000762

5/13/96  
6:05 pm

NRCC Investigation Printout

Media Type: A  
Investigator: BECKY OHLER  
Investigation Date: 3/14/96  
Investigation No: 001415A  
TIN:  
Contact Date:  
Samples Sent:  
Site Visit: Y

Complaint No: 129600420 PSDB 073036A  
Time: 09:30  
CSN: 00024239  
Name: HERCULES REAL ESTATE CORPORATION  
SIC Code:  
Samples Returned:

Result of Investigation:

No sandblasting activity during any of the three times the site was visited. No significant odor was coming from the facility either. Complaint is unconfirmed.

Rule Violated:NO VIOLATION

Location:

906 Marlin, Freeport 77541

000763

BASF 04/27/96

- 4-5497  
ETT 112

BASF  
4-27-96

000764



# DAILY TIME LOG

DATE:	4-28-97	CUSTOMER:	BASF
JOB NO:	4-5497	BARGE:	ETT 112

START TIME 7:00 AM

STOP TIME \_\_\_\_\_

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
D. Guel	<del>8</del>	8			

**MATERIAL LIST:**

Cutting Rig, Cherry Picker  
1/2" x 6' x 7'6" plate

**JOB DESCRIPTION:**

Crop damaged knuckle, Angle Iron and Stiffeners

# DAILY TIME LOG

DATE:	4 - 29 - 97	CUSTOMER:	BASF
JOB NO:	4-5497	BARGE:	ETT-112

START TIME \_\_\_\_\_

STOP TIME \_\_\_\_\_

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
SAM PETTIT	2	2			

MATERIAL LIST:

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JOB DESCRIPTION:

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CHECK BARGE FOR SAFE ENTRY AND HOT WORK

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000766

# DAILY TIME LOG

DATE:	4-30-97	CUSTOMER:	BASF
JOB NO:	4-5497	BARGE:	ETT-112

START TIME \_\_\_\_\_ STOP TIME \_\_\_\_\_

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
D. GUEL	<del>8</del>	8			
L. NAJERA	<del>2 8</del>	10			
BEN MOLINA	<del>1 1/2 8</del>	9 1/2			
PEDRO ARAÑA	<del>2 8</del>	10			
SAM PETTIT	<del>2</del>	2			

MATERIAL LIST:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

JOB DESCRIPTION:

FIT AND WELD

CHECK BARGE FOR ENTRY AND NOT WORK

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# DAILY TIME LOG

DATE:	5-1-97 <sup>2</sup>	CUSTOMER:	BASF
JOB NO:	4-5497	BARGE:	ETT-112

START TIME \_\_\_\_\_ STOP TIME \_\_\_\_\_

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
L. NAJERA	2.5	2.5			
J. SILVA	6	6			
D. GUEL	2.5	2.5			
R. NAJERA	6	6			
R. S. PETIT	2	2			

## MATERIAL LIST:

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## JOB DESCRIPTION:

FINISH WELDING

AIR TEST BOW RAKE

Check barge for entry and Hot Work

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000768

# DAILY TIME LOG

DATE:	5-2-97	CUSTOMER:	BASF
JOB NO:	4-5497	BARGE:	ETT-112

START TIME \_\_\_\_\_ STOP TIME \_\_\_\_\_

NAME	HOURS	TOTAL HOURS	NAME	HOURS	TOTAL HOURS
R.S. PETTIT	2	2			
D. GUEL	1	1			
L. NAYERA	1	1			
D. HERNANDEZ	1	1			

MATERIAL LIST:

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JOB DESCRIPTION:

CHECK BARGE FOR ENTRY AND HOT WORK  
 INSPECT BARGE WITH COAST GUARD

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000769

ATTACHMENT F

DOCUMENTATION OF THE LOADING OF ANOLON FROM TANK TRUCKS

000770

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Dan Pearson, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

October 18, 1996

Mr. Laurence E. Stuart  
Bell and Murphy  
1300 Post Oak Boulevard  
20th Floor  
Houston, Texas 77056-3095

Re: Your Request Regarding Hercules Marine Services Corporation; Your Reference No. 704-34

Dear Mr. Stuart:

On October 2, 1996, you sent to the Texas Natural Resource Conservation Commission ("Commission" or "TNRCC") a request for:

1. Any documents reflecting complaints made by Robert (Bob) Casale or Stella Casale against Hercules Marine Services Corporation since January 1, 1989;
2. Any requests or complaints by the Freeport police or fire departments for assistance in connection with complaints made by either of the Casales since January 1, 1989; and
3. Any complaints made generally, or against other companies, by Robert (Bob) Casale or Stella Casale since January 1, 1989.

On October 4, 1996, a response was sent to inform you that pursuant to the Texas Public Information Act, information in the custody of the Texas Natural Resource Conservation Commission concerning the above referenced request is a matter of public record. This letter and the enclosed information is to provide copies of information in response to your October 2, 1996 request.

If you need further information, please contact me at the address on this letterhead or at (512) 239-3506.

Sincerely,

A handwritten signature in cursive script that reads "Linda A. Warren-LaCount".

Linda A. Warren-LaCount  
Legal Assistant  
Litigation Support Division

000771

96 0925-01

COMPLAINTS INVESTIGATED AT ACCOUNT #00118V  
SEPT 1971 TO DATE  
GENERATED BY COORDINATION SERVICES ON: 09/30/96

COMPANY	COMPLAINT	NR COMP	DATE RCVD	DATE INV	INVEST	FORM	EFFECT	TYPE
HERCULES REAL ESTATE CORPORATION	078400226	1	09/05/84	09/12/84	321375A			ODOR
HERCULES REAL ESTATE CORPORATION	078400227	1	09/05/84	09/12/84	321675A			SPOKE
HERCULES REAL ESTATE CORPORATION	078500005	1	12/10/84	01/03/85	322230A			SPOKE
HERCULES REAL ESTATE CORPORATION	078500356	1	12/20/85	12/20/85	323535A			ODOR
HERCULES REAL ESTATE CORPORATION	078600017	1	01/07/86	01/13/86	323443A			ODOR
HERCULES REAL ESTATE CORPORATION	078700139	1	04/22/87	04/24/87	330175A			ODOR
HERCULES REAL ESTATE CORPORATION	078700274	1	09/01/87	09/02/87	330974A			OTHER
HERCULES REAL ESTATE CORPORATION	078900110	1	04/05/89	04/12/89	335460A		HEALTH EFFECTS	ODOR
HERCULES REAL ESTATE CORPORATION	078900131	1	05/04/89	05/17/89	335716A			ODOR
HERCULES REAL ESTATE CORPORATION	078900250	1	07/31/89	08/09/89	336515A		HEALTH EFFECTS	DUST
HERCULES REAL ESTATE CORPORATION	078900282	1	08/11/89	08/19/89	336615A			DUST
HERCULES REAL ESTATE CORPORATION	078900336	15	10/16/89	10/17/89	337114A		HEALTH EFFECTS	ODOR
HERCULES REAL ESTATE CORPORATION	079200010	1	01/03/92	05/13/92	342561A			ODOR
HERCULES REAL ESTATE CORPORATION	079200045	1	01/29/92	05/13/92	342561A			ODOR
HERCULES REAL ESTATE CORPORATION	079200278	1	05/06/92	05/07/92	342544A			DUST
HERCULES REAL ESTATE CORPORATION	079200279	1	05/06/92	05/07/92	342544A		HEALTH EFFECTS	ODOR
HERCULES REAL ESTATE CORPORATION	079200463	1	08/22/91	08/13/92	343134A			ODOR
HERCULES REAL ESTATE CORPORATION	079200471	1	03/12/92	08/13/92	343134A			SPOKE
HERCULES REAL ESTATE CORPORATION	079200486	1	08/19/92	08/20/92	343362A		PROPERTY DAMAGE	DUST
HERCULES REAL ESTATE CORPORATION	079200489	1	03/20/92	08/20/92	343362A			DUST
HERCULES REAL ESTATE CORPORATION	079500033	1	01/26/93	02/02/93	344552A			ODOR
HERCULES REAL ESTATE CORPORATION	129501548	1	02/23/95	03/07/95	043495A		HEALTH EFFECTS	ODOR
HERCULES REAL ESTATE CORPORATION	129501641	1	03/27/95	03/27/95	051815A			ODOR
HERCULES REAL ESTATE CORPORATION	129501682	1	03/27/95	05/09/95	051815A		HEALTH EFFECTS	ODOR
HERCULES REAL ESTATE CORPORATION	129501739	1	05/11/95	06/05/95	055162A			ODOR
HERCULES REAL ESTATE CORPORATION	129501766	1	06/13/95	06/20/95	054171A			ODOR
HERCULES REAL ESTATE CORPORATION	129501845	1	07/31/95	08/17/95	054415A		HEALTH EFFECTS	ODOR
HERCULES REAL ESTATE CORPORATION	129501351	1	08/02/95	08/17/95	054415A			ODOR
HERCULES REAL ESTATE CORPORATION	129600372	1	12/07/95	12/07/95	165619A			DUST

(GRAND TOTAL)

29

53

000772



9/26/96

SEARCH FOR : ..Hercules..

MASTER &amp; INVEST

Page 7

## MASTER TABLE

Complaint Num: 129501851  
KEY FIELD: 1851  
Region Code: 12  
Rec Time: 11:15  
Effect: G  
Frequency: PAST  
Orig First Name: [REDACTED]  
Orig Last Name: [REDACTED]  
Orig Name 2: [REDACTED]  
Orig Address: [REDACTED]  
Orig City: [REDACTED]  
Orig State: [REDACTED]  
Orig Phone: [REDACTED]  
Notify Brd Mtg: [REDACTED]  
Nature Code: O  
Initial Problem: Odors from Hercules on 7-29 and 7-30 were very strong. His wife was ill due to whatever she was exposed to. The wind was from the NNE. Workers told him that all they were doing was sandblasting and painting. The odor smelled like an ethylene based product. The barge that was there over the weekend left the facility on Monday 7/31.  
Type Code: AR  
Status Code: NVN  
Closure Comments:  
Closure Date: 8/02/95  
Create: 8/14/95  
Last changed: 9/19/95  
Update code: C  
Account name: HERCULES  
Assigned to: REO

Media: A  
County Code: 020  
Date Occurred: [REDACTED]  
Number Complaining: 1  
Referred By: [REDACTED]  
Orig Zip: [REDACTED]  
Alt Phone: [REDACTED]  
Notify Resolved:  
Form Code: T  
Rec Date: 8/02/95  
Priority: 3  
Confidential: Y  
Referred To:  
Orig Zip Suffix:

Final Letter:

## INVEST TABLE

Invest Num: 000903A  
ISN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
IC Code:  
IN:  
Investigator Code: REO  
Investigator: BECKY OHLER  
Investigation Date: 8/02/95  
Investigation Time: 14:05  
Prob Description: Complaint unconfirmed. See attached ROTC.  
Location:  
Subdivision:  
Offsite Y/N: Y  
Samples Sent:  
Permit-1:  
Contacted: 8/02/95  
Utility Type:  
Suspense Date:  
Violation:  
Basin:  
Registration num:  
SDB INVEST #: 058415A

Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:  
RSegment:

PWS Num:  
REG Number:

000773

9/27/96

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COMPLAINT NUM: 129501845  
Invest Num: 000929A  
SN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
IC Code:  
IN:  
Investigator Code: REO  
Investigator: BECKY OHLER  
Investigation Date: 7/31/95  
Investigation Time: 14:05  
Prob Description: Compl  
Location:  
Subdivision:  
Offsite Y/N: Y  
Samples Sent:  
Samples Returned:  
Permit-1:  
Permit-2:  
Contacted: 7/31/95  
Docket Num:  
AWS Num:  
Utility Type:  
ECN Number:  
REG Number:  
Suspense Date:  
Violation:  
Basin:  
Segment:  
Registration num:  
PSDB INVEST #: 058415A  
Complaint Num-1: 129501845  
KEY FIELD: 1845  
Media: A  
Form Code: T  
Region Code: 12  
County Code: 020  
Rec Date: 7/31/95  
Rec Time: 10:20  
Date Occurred: 7/29/95  
Priority: 3  
Effect: H  
Number Complaining: 1  
Confidential: Y  
Frequency: PAST  
Referred By:  
Referred To:  
Orig First Name: Bob  
Orig Last Name: Casales

000774

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Orig Name 2:  
Orig Address:   
Orig City:   
Orig State:   
Orig Zip:   
Orig Zip Suffix:  
Orig Phone:   
Alt Phone:  
Notify Brd Mtg:  
Notify Resolved:  
Nature Code: 0  
Page:  
Initial Problem: On sa  
Type Code: AR  
Status Code: NVN  
Closure Comments:  
Closure Date: 7/31/95  
Final Letter:  
Create: 8/02/95  
Last changed: 9/19/95  
Update code: C  
Account name-1: HERCULES  
Assigned to: REO

000775

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MASTER &amp; INVEST

Page 6

SEARCH FOR : ..Hercules..

## MASTER TABLE

Complaint Num: 129501845  
KEY FIELD: 1845  
Region Code: 12  
Rec Time: 10:20  
Effect: H  
Frequency: PAST  
Orig First Name: Bob  
Orig Last Name: Casales  
Orig Name 2:  
Orig Address:  
Orig City:  
Orig State:  
Orig Phone:  
Notify Brd Mtg:  
Nature Code:  
Initial Problem:  
Media: A  
County Code: 020  
Date Occurred: 7/29/95  
Number Complaining: 1  
Referred By:  
Form Code: T  
Rec Date: 7/31/95  
Priority: 3  
Confidential: Y  
Referred To:  
Orig Zip:  
Alt Phone:  
Notify Resolved:  
Orig Zip Suffix:  
O  
On saturday 7-29-95 Hercules had a loud hissing sound from the facility all day. A strong odor was also present which caused him and his neighbors to have headaches. Hercules would not tell him what material they were transferring. He thinks it was coming out of a barge and into a tank. It may have been a barge from DOW. The fire department was called, but because they work for DOW they did not find anything wrong. He wants to know what he was exposed to.  
AR  
NVN  
Type Code:  
Status Code:  
Closure Comments:  
Closure Date: 7/31/95  
Create: 8/02/95  
Last changed: 9/19/95  
Update code: C  
Account name: HERCULES  
Assigned to: REO  
Final Letter:

## INVEST TABLE

Invest Num: 000929A  
CSN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
SIC Code:  
FIN:  
Investigator Code: REO  
Investigation Date: 7/31/95  
Prob Description: Complaint unconfirmed. See attached ROTC. No odor detected on site visit 8-17-95.  
Investigator: BECKY OHLER  
Investigation Time: 14:05  
Location:  
Subdivision:  
Offsite Y/N: Y  
Samples Sent:  
Permit-1:  
Contacted: 7/31/95  
Utility Type:  
Suspense Date:  
Violation:  
Basin:  
Registration num:  
PSDB INVEST #: 058415A  
Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:  
PWS Num:  
REG Number:  
RSegment:

000776

9/27/96

Page 4

COMPLAINT NUM: 129501682  
Invest Num: 000723A  
CSN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
BIC Code:  
PIN:  
Investigator Code: REO  
Investigator: BECKY OHLER  
Investigation Date: 5/09/95  
Investigation Time: 10:45  
Prob Description: Uncon  
Location: 906 M  
Subdivision:  
Offsite Y/N: Y  
Samples Sent:  
Samples Returned:  
Permit-1:  
Permit-2:  
Contacted: 5/08/95  
Docket Num:  
PWS Num:  
Utility Type:  
ICN Number:  
REG Number:  
Suspense Date:  
Violation:  
Basin:  
RSegment:  
Registration num:  
PSDB INVEST #: 051815A  
Complaint Num-1: 129501682  
KEY FIELD: 1682  
Media: A  
Form Code: T  
Region Code: 12  
County Code: 020  
Rec Date: 3/29/95  
Rec Time: 10:00  
Date Occurred: 3/27/95  
Priority: 3  
Effect: H  
Number Complaining: 1  
Confidential: Y  
Frequency: INTERMITTENT  
Referred By:  
Referred To:  
Orig First Name: Bob  
Orig Last Name: Casale

000777

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Orig Name 2:  
Orig Address:   
Orig City:   
Orig State:   
Orig Zip:   
Orig Zip Suffix:  
Orig Phone:   
Alt Phone:  
Notify Brd Mtg:  
Notify Resolved:  
Nature Code: 0  
Page:  
Initial Problem: Stron  
Type Code: AR  
Status Code: NVN  
Closure Comments:  
Closure Date: 5/09/95  
Final Letter:  
Create: 4/13/95  
Last changed: 7/14/95  
Update code: C  
Account name-1: HERCULES  
Assigned to: REO

000778

9/26/96

MASTER &amp; INVEST

Page 3

SEARCH FOR : ..Hercules..

## MASTER TABLE

Complaint Num: 129501682  
KEY FIELD: 1682  
Region Code: 12  
Rec Time: 10:00  
Effect: H  
Frequency: INTERMITTENT  
Orig First Name: Bob  
Orig Last Name: Casale  
Orig Name 2:  
Orig Address:  
Orig City:  
Orig State:  
Orig Phone:  
Notify Brd Mtg:  
Nature Code:  
Initial Problem:  
Type Code:  
Status Code:  
Closure Comments:  
Closure Date:  
Create:  
Last changed:  
Update code:  
Account name:  
Assigned to:

Media: A  
County Code: 020  
Date Occurred: 3/27/95  
Number Complaining: 1  
Referred By:  
Form Code: T  
Rec Date: 3/29/95  
Priority: 3  
Confidential: Y  
Referred To:  
Orig Zip:  
Alt Phone:  
Notify Resolved:  
Orig Zip Suffix:

O  
Strong odors from Hercules barge cleaning facility is causing him to have sinus problems, headaches, and feel sick. This was referred from TNRC in Austin.  
AR  
NVN  
5/09/95  
4/13/95  
7/14/95  
C  
HERCULES  
REO  
Final Letter:

## INVEST TABLE

Invest Num: 000723A  
CSN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
SIC Code:  
TIN:  
Investigator Code: REO  
Investigation Date: 5/09/95  
Prob Description: Unconfirmed. See written report.  
Location: 906 Marlin Lane  
Subdivision:  
Offsite Y/N: Y  
Samples Sent:  
Permit-1:  
Contacted: 5/08/95  
Utility Type:  
Suspense Date:  
Violation:  
Basin:  
Registration num:  
PSDB INVEST #: 051815A

Investigator: BECKY OHLER  
Investigation Time: 10:45  
Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:  
PWS Num:  
REG Number:  
RSegment:

000779

- ☐ Add  
☐ Change  
☐ Delete

- ☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
 White - Region/Local Program  
 Canary - Data Entry Region  
 Pink - Investigator/Data Entry

# TNRCC INVESTIGATION/VIOLATION FORM

(Boldfaced items are required)

*Real Estate Corp.*

Account Number BL 0118V Account Name Hercules ~~Real Estate Corp.~~  
 Date of Investigation (as MMDDYY) 050995 Off Hours: ☐ Yes ☐ No  
 1 Investigator Staffcode REC.L Permit(s) \_\_\_\_\_  
 Primary Investigator Juriscode 120 Other Juriscode 1 \_\_\_\_\_ Other Juriscode 2 \_\_\_\_\_  
 Site Name/Location Freight house cleaning facility  
 Person Contacted/Phone Jim Jackson

Investigation Number 051815A Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 • Investigation Type COSV In-House Investigation: ☐ Yes ☒ No →EPN  
 2 Comment Complaint 129500681 and 01687 are unconfirmed. No  
odor at time of investigation  
 >>> FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY <<<  
 Date Test Conducted (as MMDDYY) \_\_\_\_\_ Date Report Received (as MMDDYY) \_\_\_\_\_  
 Analysis Review Results (C,N,U) \_\_\_\_\_ Permits(s) \_\_\_\_\_ Retest Required: ☐ Yes ☐ No

Investigation Number \_\_\_\_\_ Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 3 • Investigation Type \_\_\_\_\_ In-House Investigation: ☐ Yes ☐ No →EPN  
 Comment \_\_\_\_\_

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 4 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 • FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 4 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 • FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

- See back for valid codes and investigation type codes matrix
- EPN required for investigation types indicated on back with an \*
- FIN required for VOC violations as indicated with a + in the user's manual rule table

000780

Investigator signature Rebecca P. Doherty Date 5/10/95  
 Approved by [Signature] Date 6-1-95



Complaints 129501681 and 01682 were investigated on May 9, 1995 at 10:45 a.m. and again at 2:00 p.m. At 10:45 a.m. the wind was from the south at about 4 miles per hour. There was a moderate hydrocarbon odor downwind of Hercules. There is only salt marsh north of this facility so there was no impact at this time. The complainants are located west of the facility. The odor present downwind would not have travelled as far as the complainant's residences with a westerly wind. I met with complainant 01682 and some of his neighbors. The complainant was curious if the City of Freeport could confirm nuisance conditions. We discussed the situation for approximately an hour and a half. When I left there was still a moderate odor downwind.

I proceeded to respond to other unrelated complaints and returned to Hercules at 2:00 p.m. An odor was still present, but again would not have travelled as far as the complainants. I proceeded into the facility where I met with Jim Jackson, Co-Manager of Hercules. We discussed the complaints and I reviewed the facility records for the months of March, April, and May. The complainants alleged odors were present on March 27, 1995. Records did not show any odorous compound was cleaned on this date. The most recent barges which had been cleaned contained butanol, methanol, cumene, and ethylene dichloride. Mr. Jackson informed me that, although not required by regulation or permit, all tanks at this facility are vented to a carbon adsorption canister. He stated he is aware of the upcoming Regulation V rules which will take effect in November 1996 and will require controls on the venting and cleaning processes. He said that at this time the company is planning to install a thermal oxidizer to abate the emissions.

Mr. Jackson and I conducted a plant tour. The source of the hydrocarbon odor appeared to be in the tank farm area. We found that the piping from several of the tanks to the carbon absorber had come unattached. As stated before, these controls are not required, therefore this was not a violation. Mr. Jackson said that heavy winds a couple of days before must have knocked the piping loose. He said he would reconnect it that day.

These complaints were unconfirmed as a result of this investigation.

*Rebecca E. Ohler*

Rebecca E. Ohler

☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
White - Region/Local Program  
Canary - Data Entry/Region  
Pink - Investigator/Data Entry

**TNRCC INVESTIGATION/VIOLATION FORM**  
(Boldfaced items are required)

Account Number <u>BL0118 V</u> Account Name <u>Heracles Real Estate</u>	
Date of Investigation (as MMDDYY) <u>081795</u> Off Hours: <input type="checkbox"/> Yes <input type="checkbox"/> No	
1	Investigator Staffcode <u>K201</u> Permit(s) _____
Primary Investigator Juriscode <u>120</u> Other Juriscode 1 _____ Other Juriscode 2 _____	
Site Name/Location _____	
Person Contacted/Phone _____	
Investigation Number <u>05841514</u> Related Previous Investigation Number _____	
Federal Program: <input type="checkbox"/> Yes <input type="checkbox"/> No NSPS: <input type="checkbox"/> Yes <input type="checkbox"/> No NESHAP: <input type="checkbox"/> Yes <input type="checkbox"/> No Situation Number _____ (COMPLIANCE DIV. ONLY)	
2	Investigation Type <u>CCSV</u> In-House Investigation: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No *EPN
Comment <u>After survey conducted. No order present.</u>	
*** FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY ***	
Date Test Conducted (as MMDDYY) _____ Date Report Received (as MMDDYY) _____	
Analysis Review Results (C,N,U) _____ Permits(s) _____ Retest Required: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Investigation Number _____ Related Previous Investigation Number _____	
Federal Program: <input type="checkbox"/> Yes <input type="checkbox"/> No NSPS: <input type="checkbox"/> Yes <input type="checkbox"/> No NESHAP: <input type="checkbox"/> Yes <input type="checkbox"/> No Situation Number _____ (COMPLIANCE DIV. ONLY)	
3	Investigation Type _____ In-House Investigation: <input type="checkbox"/> Yes <input type="checkbox"/> No *EPN
Comment _____	
Investigation Number _____ Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Violation Number _____ (changes/deletes only) Situation Number _____ (Compliance Div. only)	
Cause/Description _____ (Compliance Div. only)	
Rule Violated _____ Contamcode _____	
4	Fill in the following applicable items:
Permit Number _____ Permit Provision _____	
Board Order Number _____ Court Order Number _____ CFR Part _____	
* FIN Involved _____ Facility Name (optional) _____	
Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger Date NOV Sent (as MMDDYY) _____	
Date NOV Received (as MMDDYY) _____ (defaults to 5 days after date NOV sent)	
Investigation Number _____ Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Violation Number _____ (changes/deletes only) Situation Number _____ (Compliance Div. only)	
Cause/Description _____ (Compliance Div. only)	
Rule Violated _____ Contamcode _____	
4	Fill in the following applicable items:
Permit Number _____ Permit Provision _____	
Board Order Number _____ Court Order Number _____ CFR Part _____	
* FIN Involved _____ Facility Name (optional) _____	
Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger Date NOV Sent (as MMDDYY) _____	
Date NOV Received (as MMDDYY) _____ (defaults to 5 days after date NOV sent)	

- See back for valid codes and investigation type codes matrix
- \* EPN required for investigation types indicated on back with an \*
- \* FIN required for VOC violations as indicated with a + in the user's manual rule table

000782

Investigator signature Rebecca S. O'Neil  
Approved by [Signature]

Date 8/17/95  
Date 9-6-95

## INVESTIGATION TYPE CODES MATRIX

CODE	DESCRIPTION	DR	X-	SITE	IN-	EPN	TEST	REPORT	ANLYS REVIEW
		ACCT	ACCT	VISIT	HOUSE		DATE	REC'D	RESULTS
ABSV	ASBESTOS SURVEILLANCE	A	A	R	D	D	D	D	D
ADEM	INVESTIGATE ASBESTOS DEMOLITION	R	D	R	D	D	D	D	D
ANBI	ANNUAL/BIENNIAL	D	D	R	D	A	D	D	D
AREN	INVESTIGATE ASBESTOS RENOVATION	R	D	R	D	D	D	D	D
ARSV	AREA SURVEILLANCE	A	R	R	D	D	D	D	D
B004	REGULATION 4, ANTI-TAMPERING/MISFUELING	D	A	R	D	D	D	D	D
B005	REG 5, VOLATILE ORGANIC COMPOUNDS	D	D	R	D	A	D	D	D
B010	REG 10, HAZARDOUS/SOLID WASTE FAC	D	D	R	D	A	D	D	D
B011	REG 11, MUNICIPAL SOLID WASTE FAC	D	D	R	D	A	D	D	D
BURN	BURNING SITE APPROVAL	D	D	A	A	A	D	D	D
CCEM	CONFIRM CEM INSTALLATION/PERF TEST	D	D	R	D	R	D	D	D
CEIA	CONDUCT EMISSIONS INVENTORY AUDIT	D	D	R	D	A	D	D	D
CNPT	CONDUCT PERFORMANCE TEST-STACK ONLY	D	D	R	D	R	D	D	D
CNSM	CONDUCT SAMPLE, NON-STACK ONLY	A	A	R	D	A	D	D	D
CONF	CONFERENCE/NON-FEC MEETING	A	A	A	A	A	D	D	D
COSV	COMPANY SURVEILLANCE	A	D	R	D	A	D	D	D
DCEM	ON-SITE REVIEW - CEM DATA	D	D	R	D	R	D	D	D
DECO	DETERMINE COMPLIANCE-CONSTRUCT PHASE	D	D	A	A	A	D	D	D
DEOP	DETERMINE COMPLIANCE-OPERATE PHASE	D	D	A	A	A	D	D	D
FECX	FORMAL ENFORCEMENT CONFERENCE (FEC)	A	D	A	A	A	D	D	D
FILE	FILE REVIEW	A	A	D	R	A	D	D	D
IMAI	INVESTIGATE REPORTED MAINTENANCE	D	D	R	D	A	D	D	D
INES	INVESTIGATE OTHER NESHAP ACTIVITY	D	D	R	D	A	D	D	D
IUPS	INVESTIGATE REPORTED UPSET	A	D	R	D	A	D	D	D
IVCD	INVESTIGATE VC EMERGENCY DISCHARGE	D	D	R	D	A	D	D	D
OBPT	OBSERVE STACK PERFORMANCE TEST	D	D	R	D	R	D	D	D
OBSM	OBSERVE SAMPLE, NON-STACK ONLY	D	D	R	D	A	D	D	D
ORNR	ON-SITE REVIEW NIGHT RECORDS	A	D	R	D	A	D	D	D
PMAP	PERMIT APPLICABILITY DETERMINATION	D	D	A	A	A	D	D	D
PMSI	PERMIT SITE APPROVAL	D	D	A	A	A	D	D	D
RASD	REVIEW ASBESTOS DEMOLITION NOTIF	R	D	D	R	A	R	R	R
RASR	REVIEW ASBESTOS RENOVATION NOTIF	R	D	D	R	A	R	R	R
RBZR	REVIEW BENZENE SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RCEM	REVIEW CEM PERFORMANCE TEST REPORT	D	D	D	R	R	R	R	R
ROMA	REVIEW CEM AUDIT TEST REPORT	D	D	D	R	R	R	R	R
ROMD	REVIEW CEM DATA	D	D	D	R	R	R	R	R
REER	REVIEW QUARTERLY EER	D	D	D	R	R	R	R	R
RHGR	REVIEW MERCURY SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RMAI	REVIEW PLANNED MAINTENANCE REPORT	D	D	D	R	A	R	R	R
RPFT	REVIEW PERFORMANCE TEST RPT-STK ONLY	D	D	D	R	R	R	R	R
RSAM	REVIEW NON-TACB, NON-STACK SAMPLE RPT	D	D	D	R	A	R	R	R
RUNE	REVIEW UPSET EVENT REPORTS - NESHAP	A	D	D	R	A	R	R	R
RUOT	REVIEW UPSET EVENT REPORTS - OTHER	D	D	D	R	A	R	R	R
RVCL	REVIEW VC LEAK DETECTION REPORT	D	D	D	R	A	R	R	R
RVCR	REVIEW VC QUARTERLY REPORT	D	D	D	R	A	R	R	R
RVOC	REVIEW VOC SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
SITR	SITUATION TRACKING	A	D	A	A	A	D	D	D

LEGEND: A = ALLOWED

D = DISALLOWED

R = REQUIRED

Revised 12/1/89

000783

DISTRIBUTION:  
White - Region/Local Program  
Canary - Data Entry/Region  
Pink - Investment/Data Entry

**TNRCC INVESTIGATION/VIOLATION FORM**  
*(Boldfaced items are required)*

1	Account Number <u>BL0117 V</u> Date of Investigation (as MMDDYY) <u>073195</u> Investigator Staffcode <u>KEC1</u> Primary Investigator Juriscode <u>120</u> Site Name/Location _____ Person Contacted/Phone _____	Account Name <u>Hercules Real Estate</u> Off Hours: <input type="checkbox"/> Yes <input type="checkbox"/> No Permit(s) _____ Other Juriscode 1 _____ Other Juriscode 2 _____
2	Investigation Number <u>058416A</u> Federal Program: <input type="checkbox"/> Yes <input type="checkbox"/> No    NSPS: <input type="checkbox"/> Yes <input type="checkbox"/> No    NESHAP: <input type="checkbox"/> Yes <input type="checkbox"/> No    Situation Number (COMPLIANCE DIV. ONLY) _____ • Investigation Type <u>CONE</u> In-House Investigation: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    •EPN _____ Comment <u>Complaints 295014511851 unconfirmed. No houses were cleaned according to facility log book. Fire dept. called and no orders</u> >>> FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY <<< Date Test Conducted (as MMDDYY) _____ Date Report Received (as MMDDYY) _____ Analysis Review Results (C,N,U) _____ Permits(s) _____ Retest Required: <input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Investigation Number _____ Related Previous Investigation Number _____ Federal Program: <input type="checkbox"/> Yes <input type="checkbox"/> No    NSPS: <input type="checkbox"/> Yes <input type="checkbox"/> No    NESHAP: <input type="checkbox"/> Yes <input type="checkbox"/> No    Situation Number (COMPLIANCE DIV. ONLY) _____ • Investigation Type _____ In-House Investigation: <input type="checkbox"/> Yes <input type="checkbox"/> No    •EPN _____ Comment _____	
4	Investigation Number _____ Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No Violation Number _____ (changes/deletes only) Situation Number _____ (Compliance Div. only) Cause/Description _____ (Compliance Div. only) Rule Violated _____ Contamcode _____ Fill in the following applicable items: Permit Number _____ Permit Provision _____ Board Order Number _____ Court Order Number _____ CFR Part _____ • FIN Involved _____ Facility Name (optional) _____ Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger Date NOV Sent (as MMDDYY) _____ Date NOV Received (as MMDDYY) _____ (defaults to 5 days after date NOV sent)	
4	Investigation Number _____ Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No Violation Number _____ (changes/deletes only) Situation Number _____ (Compliance Div. only) Cause/Description _____ (Compliance Div. only) Rule Violated _____ Contamcode _____ Fill in the following applicable items: Permit Number _____ Permit Provision _____ Board Order Number _____ Court Order Number _____ CFR Part _____ • FIN Involved _____ Facility Name (optional) _____ Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger Date NOV Sent (as MMDDYY) _____ Date NOV Received (as MMDDYY) _____ (defaults to 5 days after date NOV sent)	

- See back for valid codes and investigation type codes matrix
- EPN required for investigation types indicated on back with an \*
- FIN required for VOC violations as indicated with a + in the user's manual rule table

000784

Investigator signature Kelley S. Ohl

Date 7/31/55

Approved by James L. Smith

Date 2/3/14

# INVESTIGATION TYPE CODES MATRIX

CODE	DESCRIPTION	DR	X-	SITE	IN-	EPN	TEST	REPORT	ANLYS
		ACCT	ACCT	VISIT	HOUSE		DATE	REC'D	REVIEW RESULTS
ABSV	ASBESTOS SURVEILLANCE	A	A	R	D	D	D	D	D
ADEM	INVESTIGATE ASBESTOS DEMOLITION	R	D	R	D	D	D	D	D
ANBI	ANNUAL/BIENNIAL	D	D	R	D	A	D	D	D
AREN	INVESTIGATE ASBESTOS RENOVATION	R	D	R	D	D	D	D	D
ARSV	AREA SURVEILLANCE	A	R	R	D	D	D	D	D
B004	REGULATION 4,ANTI-TAMPERING/MISFUELING	D	A	R	D	D	D	D	D
B005	REG 5, VOLATILE ORGANIC COMPOUNDS	D	D	R	D	A	D	D	D
B010	REG 10, HAZARDOUS/SOLID WASTE FAC	D	D	R	D	A	D	D	D
B011	REG 11, MUNICIPAL SOLID WASTE FAC	D	D	R	D	A	D	D	D
BURN	BURNING SITE APPROVAL	D	D	A	A	A	D	D	D
CCEM	CONFIRM CEM INSTALLATION/PERF TEST	D	D	R	D	R	D	D	D
CEIA	CONDUCT EMISSIONS INVENTORY AUDIT	D	D	R	D	A	D	D	D
CNPT	CONDUCT PERFORMANCE TEST-STACK ONLY	D	D	R	D	R	D	D	D
CNSM	CONDUCT SAMPLE, NON-STACK ONLY	A	A	R	D	A	D	D	D
CONF	CONFERENCE/NON-FEC MEETING	A	A	A	A	A	D	D	D
COSV	COMPANY SURVEILLANCE	A	D	R	D	A	D	D	D
DCEM	ON-SITE REVIEW - CEM DATA	D	D	R	D	R	D	D	D
DECO	DETERMINE COMPLIANCE-CONSTRUCT PHASE	D	D	A	A	A	D	D	D
DEOP	DETERMINE COMPLIANCE-OPERATE PHASE	D	D	A	A	A	D	D	D
FECX	FORMAL ENFORCEMENT CONFERENCE (FEC)	A	D	A	A	A	D	D	D
FILE	FILE REVIEW	A	A	D	R	A	D	D	D
IMAI	INVESTIGATE REPORTED MAINTENANCE	D	D	R	D	A	D	D	D
INES	INVESTIGATE OTHER NESHAP ACTIVITY	D	D	R	D	A	D	D	D
IUPS	INVESTIGATE REPORTED UPSET	A	D	R	D	A	D	D	D
IVCD	INVESTIGATE VC EMERGENCY DISCHARGE	D	D	R	D	A	D	D	D
OBPT	OBSERVE STACK PERFORMANCE TEST	D	D	R	D	R	D	D	D
OBSM	OBSERVE SAMPLE, NON-STACK ONLY	D	D	R	D	A	D	D	D
ORNR	ON-SITE REVIEW NIGHT RECORDS	A	D	R	D	A	D	D	D
PMAP	PERMIT APPLICABILITY DETERMINATION	D	D	A	A	A	D	D	D
PMSI	PERMIT SITE APPROVAL	D	D	A	A	A	D	D	D
RASD	REVIEW ASBESTOS DEMOLITION NOTIF	R	D	D	R	A	R	R	R
RASR	REVIEW ASBESTOS RENOVATION NOTIF	R	D	D	R	A	R	R	R
RBZR	REVIEW BENZENE SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RCEM	REVIEW CEM PERFORMANCE TEST REPORT	D	D	D	R	R	R	R	R
RCMA	REVIEW CEM AUDIT TEST REPORT	D	D	D	R	R	R	R	R
RCMD	REVIEW CEM DATA	D	D	D	R	R	R	R	R
REER	REVIEW QUARTERLY EER	D	D	D	R	R	R	R	R
RHGR	REVIEW MERCURY SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RMAI	REVIEW PLANNED MAINTENANCE REPORT	D	D	D	R	A	R	R	R
RPFT	REVIEW PERFORMANCE TEST RPT-STK ONLY	D	D	D	R	R	R	R	R
RSAM	REVIEW NON-TACB, NON-STACK SAMPLE RPT	D	D	D	R	A	R	R	R
RUNE	REVIEW UPSET EVENT REPORTS - NESHAP	A	D	D	R	A	R	R	R
RJOT	REVIEW UPSET EVENT REPORTS - OTHER	D	D	D	R	A	R	R	R
RVCL	REVIEW VC LEAK DETECTION REPORT	D	D	D	R	A	R	R	R
RVCR	REVIEW VC QUARTERLY REPORT	D	D	D	R	A	R	R	R
RVOC	REVIEW VOC SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
SITR	SITUATION TRACKING	A	D	A	A	A	D	D	D

LEGEND: A = ALLOWED

D = DISALLOWED

R = REQUIRED

000785

Revised 12/1/89

9/20/95  
9:33 am

TNRCC Complaint Printout - w/o Complainant Info

Media Type: A	Complaint No: 129501845	Assigned To REO
Date Recvd: 7/31/95	Time Recvd: 10:20	Priority: 3
Complainant's Info		County 020 Brazoria
First/Last Name		Title/Org:
Address		
City, State, Zip		
Phone	Alt Phone:	Type Code: AR Effect: H

Initial Problem

On saturday 7-29-95 Hercules had a loud hissing sound from the facility all day. A strong odor was also present which caused him and his neighbors to have headaches. Hercules would not tell him what material they were transferring. He thinks it was coming out of a barge and into a tank. It may have been a barge from DOW. The fire department was called, but because they work for DOW they did not find anything wrong. He wants to know what he was exposed to.

#Complaining: 1	Date Occurred: 7/29/95	Form T:	Nature: O
Frequency: PAST	Confidential: Y	Referred By:	Referred To:

Date Complaint Notified of Commissioners Mtg/Formal Action:	Date of Formal Action:
--	---------------------------

Closure Comments

Closure Code: NVN	Closure Date: 7/31/95	Final Letter:
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Rebecca S. OHL  
Investigator

Larry Pinner  
Region or Program Manager  
8/1/95  
Date

Attachments(s): Correspondence \_\_\_\_\_  
Samples \_\_\_\_\_  
Photos \_\_\_\_\_  
Other \_\_\_\_\_

000786

9/20/95  
9:43 am

TNRCC Investigation Printout

Page 20

Media Type: A  
Investigator: BECKY OHLER  
Investigation Date: 7/31/95  
Investigation No: 000929A  
TIN:  
Contact Date: 7/31/95  
Samples Sent:  
Site Visit: Y

Complaint No: 129501845 PSDB 058415A  
Time: 14:05  
CSN: 00024239  
Name: HERCULES REAL ESTATE CORPORATION  
SIC Code:  
Samples Returned:

Result of Investigation:

Complaint unconfirmed. See attached ROTC. No odor detected on site visit 8-17-95.

Rule Violated:NO VIOLATION

Location:

000787

9/20/95  
9:33 am

TNRCC Complaint Printout - w/o Complainant Info

Media Type: A	Complaint No: 129501851	Assigned To REO
Date Recvd: 8/02/95	Time Recvd: 11:15	Priority: 3
Complainant's Info		County 020 Brazoria
First/Last Name		Title/Org:
Address		
City, State, Zip		
Phone	Alt Phone:	Type Code: AR Effect: G

Initial Problem

Odors from Hercules on 7-29 and 7-30 were very strong. [redacted]  
[redacted] The wind was from the NNE. Workers told him that all they were doing was sandblasting and painting. The odor smelled like an ethylene based product. The barge that was there over the weekend left the facility on Monday 7/31.

#Complaining: 1	Date Occurred: 7/29/95	Form T:	Nature: O
Frequency: PAST	Confidential: Y	Referred By:	Referred To:

Date Complaint Notified of Commissioners Mtg/Formal Action:	Date of Formal Action:
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Closure Comments

Closure Code: NVN	Closure Date: 8/02/95	Final Letter:
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Rebecca S. Oehl  
Investigator

Larry R. [redacted]  
Region or Program Manager  
11/1/95  
Date

Attachments(s): Correspondence \_\_\_\_\_  
Samples \_\_\_\_\_  
Photos \_\_\_\_\_  
Other \_\_\_\_\_

000788



9/20/95  
9:43 am

TNRCC Investigation Printout

Page 23

Media Type: A  
Investigator: BECKY OHLER  
Investigation Date: 8/02/95  
Investigation No: 000903A  
TIN:  
Contact Date: 8/02/95  
Samples Sent:  
Site Visit: Y

Complaint No: 129501851 PSDB 058415A  
Time: 14:05  
CSN: 00024239  
Name: HERCULES REAL ESTATE CORPORATION  
SIC Code:  
Samples Returned:

Result of Investigation:

Complaint unconfirmed. See attached ROTC.

Rule Violated:NO VIOLATION

Location:

000789



# INVESTIGATION TYPE CODES MATRIX

CODE DESCRIPTION	DR	X-	SITE	IN-	EPN	TEST	REPORT	ANLYS
	ACCT	ACCT	VISIT	HOUSE		DATE	REC'D	REVIEW RESULTS
ABSV ASBESTOS SURVEILLANCE	A	A	R	D	D	D	D	D
ADEM INVESTIGATE ASBESTOS DEMOLITION	R	D	R	D	D	D	D	D
ANBI ANNUAL/BIENNIAL	D	D	R	D	A	D	D	D
AREN INVESTIGATE ASBESTOS RENOVATION	R	D	R	D	D	D	D	D
ARSV AREA SURVEILLANCE	A	R	R	D	D	D	D	D
B004 REGULATION 4, ANTI-TAMPERING/MISFUELING	D	A	R	D	D	D	D	D
B005 REG 5, VOLATILE ORGANIC COMPOUNDS	D	D	R	D	A	D	D	D
B010 REG 10, HAZARDOUS/SOLID WASTE FAC	D	D	R	D	A	D	D	D
B011 REG 11, MUNICIPAL SOLID WASTE FAC	D	D	R	D	A	D	D	D
BURN BURNING SITE APPROVAL	D	D	A	A	A	D	D	D
CCEM CONFIRM CEM INSTALLATION/PERF TEST	D	D	R	D	R	D	D	D
CEIA CONDUCT EMISSIONS INVENTORY AUDIT	D	D	R	D	A	D	D	D
CNPT CONDUCT PERFORMANCE TEST-STACK ONLY	D	D	R	D	R	D	D	D
CNSM CONDUCT SAMPLE, NON-STACK ONLY	A	A	R	D	A	D	D	D
CONF CONFERENCE/NON-FEC MEETING	A	A	A	A	A	D	D	D
COSV COMPANY SURVEILLANCE	A	D	R	D	A	D	D	D
DCEM ON-SITE REVIEW - CEM DATA	D	D	R	D	R	D	D	D
DECO DETERMINE COMPLIANCE-CONSTRUCT PHASE	D	D	A	A	A	D	D	D
DEOP DETERMINE COMPLIANCE-OPERATE PHASE	D	D	A	A	A	D	D	D
FECX FORMAL ENFORCEMENT CONFERENCE (FEC)	A	D	A	A	A	D	D	D
FILE FILE REVIEW	A	A	D	R	A	D	D	D
IMAI INVESTIGATE REPORTED MAINTENANCE	D	D	R	D	A	D	D	D
INES INVESTIGATE OTHER NESHAP ACTIVITY	D	D	R	D	A	D	D	D
IUPS INVESTIGATE REPORTED UPSET	A	D	R	D	A	D	D	D
IVCD INVESTIGATE VC EMERGENCY DISCHARGE	D	D	R	D	A	D	D	D
OBPT OBSERVE STACK PERFORMANCE TEST	D	D	R	D	R	D	D	D
OBSM OBSERVE SAMPLE, NON-STACK ONLY	D	D	R	D	A	D	D	D
ORNR ON-SITE REVIEW NIGHT RECORDS	A	D	R	D	A	D	D	D
PMAP PERMIT APPLICABILITY DETERMINATION	D	D	A	A	A	D	D	D
PMSI PERMIT SITE APPROVAL	D	D	A	A	A	D	D	D
RASD REVIEW ASBESTOS DEMOLITION NOTIF	R	D	D	R	A	R	R	R
RASR REVIEW ASBESTOS RENOVATION NOTIF	R	D	D	R	A	R	R	R
RBZR REVIEW BENZENE SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RCEM REVIEW CEM PERFORMANCE TEST REPORT	D	D	D	R	R	R	R	R
RCMA REVIEW CEM AUDIT TEST REPORT	D	D	D	R	R	R	R	R
RCMD REVIEW CEM DATA	D	D	D	R	R	R	R	R
REER REVIEW QUARTERLY EER	D	D	D	R	R	R	R	R
RHGR REVIEW MERCURY SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RMAI REVIEW PLANNED MAINTENANCE REPORT	D	D	D	R	A	R	R	R
RPFT REVIEW PERFORMANCE TEST RPT-STK ONLY	D	D	D	R	R	R	R	R
RSAM REVIEW NON-TACB, NON-STACK SAMPLE RPT	D	D	D	R	A	R	R	R
RUNE REVIEW UPSET EVENT REPORTS - NESHAP	A	D	D	R	A	R	R	R
RUOT REVIEW UPSET EVENT REPORTS - OTHER	D	D	D	R	A	R	R	R
RVCL REVIEW VC LEAK DETECTION REPORT	D	D	D	R	A	R	R	R
RVCR REVIEW VC QUARTERLY REPORT	D	D	D	R	A	R	R	R
RVOC REVIEW VOC SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
SITR SITUATION TRACKING	A	D	A	A	A	D	D	D

LEGEND: A = ALLOWED D = DISALLOWED R = REQUIRED

000791

Revised 12/1/89

Complaints 129501681 and 01682 were investigated on May 9, 1995 at 10:45 a.m. and again at 2:00 p.m. At 10:45 a.m. the wind was from the south at about 4 miles per hour. There was a moderate hydrocarbon odor downwind of Hercules. There is only salt marsh north of this facility so there was no impact at this time. The complainants are located west of the facility. The odor present downwind would not have travelled as far as the complainant's residences with a westerly wind. I met with complainant 01682 and some of his neighbors. The complainant was curious if the City of Freeport could confirm nuisance conditions. We discussed the situation for approximately an hour and a half. When I left there was still a moderate odor downwind.

I proceeded to respond to other unrelated complaints and returned to Hercules at 2:00 p.m. An odor was still present, but again would not have travelled as far as the complainants. I proceeded into the facility where I met with Jim Jackson, Co-Manager of Hercules. We discussed the complaints and I reviewed the facility records for the months of March, April, and May. The complainants alleged odors were present on March 27, 1995. Records did not show any odorous compound was cleaned on this date. The most recent barges which had been cleaned contained butanol, methanol, cumene, and ethylene dichloride. Mr. Jackson informed me that, although not required by regulation or permit, all tanks at this facility are vented to a carbon adsorption canister. He stated he is aware of the upcoming Regulation V rules which will take effect in November 1996 and will require controls on the venting and cleaning processes. He said that at this time the company is planning to install a thermal oxidizer to abate the emissions.

Mr. Jackson and I conducted a plant tour. The source of the hydrocarbon odor appeared to be in the tank farm area. We found that the piping from several of the tanks to the carbon absorber had come unattached. As stated before, these controls are not required, therefore this was not a violation. Mr. Jackson said that heavy winds a couple of days before must have knocked the piping loose. He said he would reconnect it that day.

These complaints were unconfirmed as a result of this investigation.

Rebecca E. Ohler

000792

RECORD OF TELEPHONE CALL



DATE: 7/31/95  
TIME: 2:05 p.m.

PERSON MAKING CALL: Becky Ohler

PHONE:

COMPANY: TNRCC Region 12

CITY:

PERSON RECEIVING CALL: Larry Ballinger  
PHONE: 409 233-6371

COMPANY: Hercules Real Estate

CITY: Freeport

---

SUBJECT: Complaint  
ACCOUNT NO.: BL-0118-V

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SUMMARY: I contacted Mr. Ballinger at the request of the complainant who wanted to know what Hercules had been releasing on Saturday, July 29, 1995. Mr. Ballinger said that no work other than welding was conducted at the facility between 10:30 p.m. on Friday, July 28th, and Monday morning, July 31st. He said an air compressor had inadvertently been left on over the weekend which caused the noise that the complainant referred to. A caustic barge was tied up at the dock over the weekend, but no work was conducted on the barge. He said he would be happy to fax a copy of the logbook for the weekend time frame, but said it does not have any entries because no work was done.

As a result of complaints to the City of Freeport this weekend Hercules was visited by the City Council, the Mayor, the Fire Department, and the Police on Sunday, July 30th. He said that no one was able to detect any odors and no problems or violations of any kind were documented. Mr. Ballinger feels that the complainant heard the noise of the compressor and imagined the odors.

- ☐ Add  
☐ Change  
☐ Delete

- ☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
White - Region/Local Program  
Canary - Data Entry/Region  
Pink - Investigator/Data Entry

TNRCC INVESTIGATION/VIOLATION FORM

(Boldfaced items are required)

Account Number BL 0118 V Account Name Heracles, Inc. ~~Offshore~~  
Date of Investigation (as MMDDYY) 050995 Off Hours: ☐ Yes ☐ No  
1 Investigator Staffcode RE01 Permit(s) \_\_\_\_\_  
Primary Investigator Juriscode 120 Other Juriscode 1 \_\_\_\_\_ Other Juriscode 2 \_\_\_\_\_  
Site Name/Location Freight barge cleaning facility  
Person Contacted/Phone Jim Jackson

Investigation Number 051815H Related Previous Investigation Number \_\_\_\_\_  
Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
(COMPLIANCE DIV. ONLY)  
• Investigation Type COSV In-House Investigation: ☐ Yes ☒ No --EPN  
2 Comment Complaint 12950681 and 01682 are unconfirmed. No odor at time of investigation  
Date Test Conducted (as MMDDYY) \_\_\_\_\_ Date Report Received (as MMDDYY) \_\_\_\_\_  
Analysis Review Results (C,N,U) \_\_\_\_\_ Permits(s) \_\_\_\_\_ Retest Required: ☐ Yes ☐ No

Investigation Number \_\_\_\_\_ Related Previous Investigation Number \_\_\_\_\_  
Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
(COMPLIANCE DIV. ONLY)  
3 • Investigation Type \_\_\_\_\_ In-House Investigation: ☐ Yes ☐ No --EPN  
Comment \_\_\_\_\_

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
Cause/Description \_\_\_\_\_ (Compliance Div. only)  
Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
4 Fill in the following applicable items:  
Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
• FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
Cause/Description \_\_\_\_\_ (Compliance Div. only)  
Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
4 Fill in the following applicable items:  
Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
• FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

- See back for valid codes and investigation type codes matrix
- EPN required for investigation types indicated on back with an \*
- FIN required for VOC violations as indicated with a + in the user's manual rule table

000794

Investigator signature

Rebecca E. O'Neil

Date

5/10/95

Approved by

Steve B. [Signature]

Date

6-1-95

# INVESTIGATION TYPE CODES MATRIX

CODE	DESCRIPTION	DR	X-	SITE	IN-	EPN	TEST	REPORT	ANLYS
		ACCT	ACCT	VISIT	HOUSE		DATE	REC'D	REVIEW RESULTS
ABSV	ASBESTOS SURVEILLANCE	A	A	R	D	D	D	D	D
ADEM	INVESTIGATE ASBESTOS DEMOLITION	R	D	R	D	D	D	D	D
ANBI	ANNUAL/BIENNIAL	D	D	R	D	A	D	D	D
AREN	INVESTIGATE ASBESTOS RENOVATION	R	D	R	D	D	D	D	D
ARSV	AREA SURVEILLANCE	A	R	R	D	D	D	D	D
B004	REGULATION 4,ANTI-TAMPERING/MISFUELING	D	A	R	D	D	D	D	D
B005	REG 5, VOLATILE ORGANIC COMPOUNDS	D	D	R	D	A	D	D	D
B010	REG 10, HAZARDOUS/SOLID WASTE FAC	D	D	R	D	A	D	D	D
B011	REG 11, MUNICIPAL SOLID WASTE FAC	D	D	R	D	A	D	D	D
BURN	BURNING SITE APPROVAL	D	D	A	A	A	D	D	D
CCEM	CONFIRM CEM INSTALLATION/PERF TEST	D	D	R	D	R	D	D	D
CEIA	CONDUCT EMISSIONS INVENTORY AUDIT	D	D	R	D	A	D	D	D
CNPT	CONDUCT PERFORMANCE TEST-STACK ONLY	D	D	R	D	R	D	D	D
CNSM	CONDUCT SAMPLE, NON-STACK ONLY	A	A	R	D	A	D	D	D
CONF	CONFERENCE/NON-FEC MEETING	A	A	A	A	A	D	D	D
COSV	COMPANY SURVEILLANCE	A	D	R	D	A	D	D	D
DCEM	ON-SITE REVIEW - CEM DATA	D	D	R	D	R	D	D	D
DECO	DETERMINE COMPLIANCE-CONSTRUCT PHASE	D	D	A	A	A	D	D	D
DEOP	DETERMINE COMPLIANCE-OPERATE PHASE	D	D	A	A	A	D	D	D
FECX	FORMAL ENFORCEMENT CONFERENCE (FEC)	A	D	A	A	A	D	D	D
FILE	FILE REVIEW	A	A	D	R	A	D	D	D
IMAI	INVESTIGATE REPORTED MAINTENANCE	D	D	R	D	A	D	D	D
INES	INVESTIGATE OTHER NESHAP ACTIVITY	D	D	R	D	A	D	D	D
IUPS	INVESTIGATE REPORTED UPSET	A	D	R	D	A	D	D	D
IVCD	INVESTIGATE VC EMERGENCY DISCHARGE	D	D	R	D	A	D	D	D
OBPT	OBSERVE STACK PERFORMANCE TEST	D	D	R	D	R	D	D	D
OBSM	OBSERVE SAMPLE, NON-STACK ONLY	D	D	R	D	A	D	D	D
ORNR	ON-SITE REVIEW NIGHT RECORDS	A	D	R	D	A	D	D	D
PMAP	PERMIT APPLICABILITY DETERMINATION	D	D	A	A	A	D	D	D
PMSI	PERMIT SITE APPROVAL	D	D	A	A	A	D	D	D
RASD	REVIEW ASBESTOS DEMOLITION NOTIF	R	D	D	R	A	R	R	R
RASR	REVIEW ASBESTOS RENOVATION NOTIF	R	D	D	R	A	R	R	R
RBZR	REVIEW BENZENE SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RCEM	REVIEW CEM PERFORMANCE TEST REPORT	D	D	D	R	R	R	R	R
ROMA	REVIEW CEM AUDIT TEST REPORT	D	D	D	R	R	R	R	R
ROMD	REVIEW CEM DATA	D	D	D	R	R	R	R	R
REER	REVIEW QUARTERLY EER	D	D	D	R	R	R	R	R
RHGR	REVIEW MERCURY SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
RMAI	REVIEW PLANNED MAINTENANCE REPORT	D	D	D	R	A	R	R	R
RPFT	REVIEW PERFORMANCE TEST RPT-STK ONLY	D	D	D	R	R	R	R	R
RSAM	REVIEW NON-TACB, NON-STACK SAMPLE RPT	D	D	D	R	A	R	R	R
RUNE	REVIEW UPSET EVENT REPORTS - NESHAP	A	D	D	R	A	R	R	R
RUOT	REVIEW UPSET EVENT REPORTS - OTHER	D	D	D	R	A	R	R	R
RVCL	REVIEW VC LEAK DETECTION REPORT	D	D	D	R	A	R	R	R
RVCR	REVIEW VC QUARTERLY REPORT	D	D	D	R	A	R	R	R
RVOC	REVIEW VOC SEMI-ANNUAL REPORT	D	D	D	R	A	R	R	R
SITR	SITUATION TRACKING	A	D	A	A	A	D	D	D

LEGEND: A = ALLOWED

D = DISALLOWED

R = REQUIRED

000795

Revised 12/1/89

Hercules  
BL0118V

5/9/95

Complaints 129501681 and 01682 were investigated on May 9, 1995 at 10:45 a.m. and again at 2:00 p.m. At 10:45 a.m. the wind was from the south at about 4 miles per hour. There was a moderate hydrocarbon odor downwind of Hercules. There is only salt marsh north of this facility so there was no impact at this time. The complainants are located west of the facility. The odor present downwind would not have travelled as far as the complainant's residences with a westerly wind. I met with complainant 01682 and some of his neighbors. The complainant was curious if the City of Freeport could confirm nuisance conditions. We discussed the situation for approximately an hour and a half. When I left there was still a moderate odor downwind.

I proceeded to respond to other unrelated complaints and returned to Hercules at 2:00 p.m. An odor was still present, but again would not have travelled as far as the complainants. I proceeded into the facility where I met with Jim Jackson, Co-Manager of Hercules. We discussed the complaints and I reviewed the facility records for the months of March, April, and May. The complainants alleged odors were present on March 27, 1995. Records did not show any odorous compound was cleaned on this date. The most recent barges which had been cleaned contained butanol, methanol, cumene, and ethylene dichloride. Mr. Jackson informed me that, although not required by regulation or permit, all tanks at this facility are vented to a carbon adsorption canister. He stated he is aware of the upcoming Regulation V rules which will take effect in November 1996 and will require controls on the venting and cleaning processes. He said that at this time the company is planning to install a thermal oxidizer to abate the emissions.

Mr. Jackson and I conducted a plant tour. The source of the hydrocarbon odor appeared to be in the tank farm area. We found that the piping from several of the tanks to the carbon absorber had come unattached. As stated before, these controls are not required, therefore this was not a violation. Mr. Jackson said that heavy winds a couple of days before must have knocked the piping loose. He said he would reconnect it that day.

These complaints were unconfirmed as a result of this investigation.

*Rebecca E. Ohler*

Rebecca E. Ohler

000796



7/14/95  
9:19 am

TNRCC Complaint Printout - w/o Complainant Info

Media Type: A	Complaint No: 129501681	Assigned To REO
Date Recvd: 3/29/95	Time Recvd: 14:10	Priority: 3
Complainant's Info		County 020 Brazoria
First/Last Name	Title/Org:	
Address		
City, State, Zip		
Phone	Alt Phone:	Type Code: AR Effect: G

Initial Problem

Vapors from barge cleaning at Hercules are impacting complainant and might be harmful. Problem called into the City of Freeport Building and Health Department at about 1:00 pm on 3/27/95. Please forward a copy of the report (non-confidential version) to City of Freeport, Attention Ron Gaines, Building and Health Dept. Freeport, TX 77541

#Complaining: 1	Date Occurred: 3/27/95	Form T:	Nature: O
Frequency: PAST	Confidential: Y	Referred By: CI	Referred To:

Date Complaint Notified of Commissioners Mtg/Formal Action:	Date of Formal Action:
--	---------------------------

Closure Comments

Closure Code: NVN	Closure Date: 5/09/95	Final Letter:
-------------------	-----------------------	---------------

Rebecca E. Oller  
Investigator

Larry Binkley  
Region or Program Manager  
8/3/95  
Date

Attachments(s): Correspondence \_\_\_\_\_  
Samples \_\_\_\_\_  
Photos \_\_\_\_\_  
Other \_\_\_\_\_

000797

7/14/95  
9:20 am

TNRCC Investigation Printout

Page 3

Media Type: A  
Investigator: BECKY OHLER  
Investigation Date: 5/09/95  
Investigation No: 000722A  
TIN:  
Contact Date: 5/11/95  
Samples Sent:  
Site Visit: Y

Complaint No: 129501681 PSDB 051815A  
Time: 10:45  
CSN: 00024239  
Name: HERCULES REAL ESTATE CORPORATION  
SIC Code:  
Samples Returned:

Result of Investigation:

Unconfirmed. See written report.

Rule Violated:NO VIOLATION

Location:

906 Marlin Drive, Freeport

000798

7/14/95  
9:19 am

TNRCC Complaint Printout - w/o Complainant Info

Media Type: A	Complaint No: 129501682	Assigned To REO
Date Recvd: 3/29/95	Time Recvd: 10:00	Priority: 3
Complainant's Info		County 020 Brazoria
First/Last Name	Title/Org:	
Address		
City, State, Zip		
Phone	Alt Phone:	Type Code: AR Effect: H

**Initial Problem**

Strong odors from Hercules barge cleaning facility is causing him to have sinus problems, headaches, and feel sick. This was referred from TNRCC in Austin.

#Complaining: 1	Date Occurred: 3/27/95	Form T:	Nature: O
Frequency: INTERMITTENT	Confidential: Y	Referred By:	Referred To:

Date Complaint Notified of Commissioners Mtg/Formal Action:	Date of Formal Action:
--	---------------------------

**Closure Comments**

Closure Code: NVN	Closure Date: 5/09/95	Final Letter:
-------------------	-----------------------	---------------

Rebecca E. Ohler  
Investigator

Larry Priddy  
Region or Program Manager

8/3/95  
Date

Attachments(s): Correspondence \_\_\_\_\_  
Samples \_\_\_\_\_  
Photos \_\_\_\_\_  
Other \_\_\_\_\_

000799

7/14/95  
9:20 am

TNRCC Investigation Printout

Page 4

Media Type: A  
Investigator: BECKY OHLER  
Investigation Date: 5/09/95  
Investigation No: 000723A  
TIN:  
Contact Date: 5/08/95  
Samples Sent:  
Site Visit: Y

Complaint No: 129501682 PSDB 051815A  
Time: 10:45  
CSN: 00024239  
Name: HERCULES REAL ESTATE CORPORATION  
SIC Code:  
Samples Returned:

Result of Investigation:

Unconfirmed. See written report.

Rule Violated:NO VIOLATION

Location:

906 Marlin Lane

000800

3/27/96

Page 6

COMPLAINT NUM: 129501739  
Invest Num: 000769A  
IN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
IC Code:  
IN:  
Investigator Code: SAA  
Investigator: SAM AKINOLA  
Investigation Date: 6/05/95  
Investigation Time: 14:05  
Prob Description: Odor  
Location:  
Subdivision:  
Offsite Y/N: Y  
Samples Sent:  
Samples Returned:  
Permit-1:  
Permit-2:  
Contacted: 5/11/95  
Ticket Num:  
WS Num:  
Utility Type:  
CN Number:  
EG Number:  
Suspense Date:  
Isolation:  
Reason:  
Segment:  
Registration num:  
SDB INVEST #: 055162A  
Complaint Num-1: 129501739  
EY FIELD: 1739  
Media: A  
Form Code: T  
Region Code: 12  
County Code: 020  
Rec Date: 5/11/95  
Rec Time: 16:25  
Date Occurred: 5/11/95  
Priority: 3  
Effect: G  
Number Complaining: 1  
Confidential: Y  
Frequency: CURRENT  
Referred By:  
Referred To:  
Orig First Name: Bob  
Orig Last Name: Casale

000801

9/27/96

Page 7

rig Name 2:  
rig Address:  
rig City:  
rig State:  
rig Zip:  
rig Zip:  
rig Phone:  
lt Phone:  
otify Brd Mtg:  
otify Resolved:  
ature Code: O  
age:  
nitial Problem: Bad o  
ype Code: AR  
tatus Code: NVN  
losure Comments:  
losure Date: 6/05/95  
inal Letter:  
reate: 5/18/95  
ast changed: 7/28/95  
pdate code: C  
ccount name-1: HERCULES  
assigned to: SAA

000801A

/26/96

SEARCH FOR : ..Hercules..

MASTER &amp; INVEST

Page 4

## MASTER TABLE

Complaint Num: 129501739  
Y FIELD: 1739  
Region Code: 12  
County Code: 020  
Date Occurred: 5/11/95  
Priority: 3  
Confidential: Y  
Form Code: T  
Rec Date: 5/11/95  
Priority: 3  
Confidential: Y  
Referred To:  
Frequency: CURRENT  
Referred By:  
Orig Zip:  
Alt Phone:  
Notify Resolved:  
Orig Zip Suffix:  
Complainant Name: Bob Casale  
Complainant Address:  
Complainant City:  
Complainant State:  
Complainant Phone:  
Notify Brd Mtg:  
Nature Code:  
Initial Problem: Bad odors from the Hercules company is bad right now. Complainant wants someone to investigate.  
Status Code: AR  
Status Code: NVN  
Closure Comments:  
Closure Date: 6/05/95  
Final Letter:  
Create: 5/18/95  
Last changed: 7/28/95  
Update code: C  
Account name: HERCULES  
Assigned to: SAA

## INVEST TABLE

Invest Num: 000769A  
IN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
IC Code:  
IN:  
Investigator Code: SAA  
Investigator: SAM AKINOLA  
Investigation Date: 6/05/95  
Investigation Time: 14:05  
Job Description: Odor complaint investigated on June 5, 1995. Complaint No. 129501739 unconfirmed. See written report.  
Location:  
Subdivision:  
Effsite Y/N: Y  
Samples Sent:  
Permit-1:  
Permit-2:  
Contacted: 5/11/95  
Docket Num:  
CCN Number:  
PWS Num:  
REG Number:  
Isolation:  
asin:  
Registration num:  
SDB INVEST #: 055162A  
RSegment:

000802

- ☒ Add  
☐ Change  
☐ Delete

- ☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
White - Region/Local Program  
Canary - Data Entry/Region  
Pink - Investigator/Data Entry

# TNRCC INVESTIGATION/VIOLATION FORM

(Boldfaced items are required)

Real Estate Corp.

Account Number **BL 0118V** Account Name **Hercules Offshore Company**  
Date of Investigation (as MMDDYY) **06-05-95** Off Hours: ☐ Yes ☒ No  
1 Investigator Staffcode **SAA1** Permit(s) \_\_\_\_\_  
Primary Investigator Juriscode **120** Other Juriscode 1 \_\_\_\_\_ Other Juriscode 2 \_\_\_\_\_  
Site Name/Location **Hercules Offshore 11381 Meadow Glen Lane, Freeport**  
Person Contacted/Phone **Larry Bullinger**

Investigation Number **055162A** Related Previous Investigation Number \_\_\_\_\_  
Federal Program: ☐ Yes ☒ No NSPS: ☐ Yes ☒ No NESHAP: ☐ Yes ☒ No Situation Number \_\_\_\_\_  
(COMPLIANCE DIV. ONLY)  
• Investigation Type **COSV** In-House Investigation: ☐ Yes ☒ No EPN \_\_\_\_\_  
2 Comment **Complaint #129501739 investigated on 06-05-95. odor complaint unconfirmed. See Attached report.**  
Date Test Conducted (as MMDDYY) \_\_\_\_\_ Date Report Received (as MMDDYY) \_\_\_\_\_  
Analysis Review Results (C,N,U) \_\_\_\_\_ Permits(s) \_\_\_\_\_ Retest Required: ☐ Yes ☐ No

Investigation Number \_\_\_\_\_ Related Previous Investigation Number \_\_\_\_\_  
Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
(COMPLIANCE DIV. ONLY)  
3 • Investigation Type \_\_\_\_\_ In-House Investigation: ☐ Yes ☐ No EPN \_\_\_\_\_  
Comment \_\_\_\_\_

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
Cause/Description \_\_\_\_\_ (Compliance Div. only)  
Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
4 Fill in the following applicable items:  
Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
• FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
Cause/Description \_\_\_\_\_ (Compliance Div. only)  
Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
4 Fill in the following applicable items:  
Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
• FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

000803

- See back for valid codes and investigation type codes matrix
- EPN required for investigation types indicated on back with an \*
- FIN required for violations as indicated with a + in the user's manual rule table

Investigator signature \_\_\_\_\_  
Approved by \_\_\_\_\_

Date **06-05-95**  
Date **7-16-95**



Investigator's Comments  
Hercules Offshore  
Freeport, Brazoria County  
Investigation No. 055162A


-0118-V  
-05-95  
Page 1


Purpose: This investigation was conducted on June 5, 1995, in response to complaint No. 129501739. This complaint was received by telephone at the TNRCC office on May 11, 1995. The complainant alleged that odor from the Hercules Offshore Barge cleaning operation, located at 11381 Meadowglen Lane, Freeport, Brazoria County smells bad and that the odor is impacting complainant's house.

Investigative Findings: This investigation was conducted on June 5, 1995, by investigator's Sam Akinola and Jay Low. A telephone call was made to the complainant's house to obtain direction to the complainant's residence. We arrived at the complainant's house at approximately 2:05 p.m. A visual and odor survey was performed along the complainant's property lines. The wind was from the southeast at 6 miles per hour. There was no odor detected at the complainant's property when this investigation was conducted. We were unable to talk with anybody at the complainant's residence about the investigative findings because the complainant was not at home.

We left the complainant's property and proceeded to the alleged odor source. On arrival at this facility, an odor survey was performed along the Hercules company's property lines. There was no odor detected at the time of this investigation. We went inside the facility to talk with the responsible party. We met with Mr. Larry Ballinger, Operations Manager. He was informed about the complaint and the investigative findings. Upon further review of facility's records, it appears that the company is in compliance with all the General Provisions of Permit Exemption No. 13561.

Conclusion: There was no nuisance odor detected at the time of this investigation. Complaint No. 129501737 is unconfirmed.

  
Sam A. Akinola  
Environmental Quality Specialist  
Region 12

  
Jay Low  
Environmental Quality Specialist  
Region 12

000804

Investigator' Comments  
Hercules Offshore  
Freeport, Brazoria County  
Investigation No. 055162A

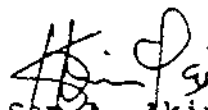
3L-0118-V  
06-05-95  
Page 1


Purpose: This investigation was conducted on June 5, 1995, in response to complaint No. 129501739. This complaint was received by telephone at the TNRCC office on May 11, 1995. The complainant alleged that odor from the Hercules Offshore Barge cleaning operation, located at 11381 Meadowglen Lane, Freeport, Brazoria County smells bad and that the odor is impacting complainant's house.

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Conclusion: There was no nuisance odor detected at the time of this investigation. Complaint No. 129501737 is unconfirmed.

  
Sam A. Akinola  
Environmental Quality Specialist  
Region 12

  
Jay Low  
Environmental Quality Specialist  
Region 12

000805

Hercules  
BL0118V

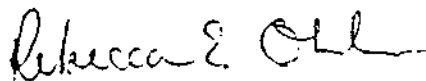
5/19/95

Complaints 129501681 and 01682 were investigated on May 9, 1995 at 10:45 a.m. and again at 2:00 p.m. At 10:45 a.m. the wind was from the south at about 4 miles per hour. There was a moderate hydrocarbon odor downwind of Hercules. There is only salt marsh north of this facility so there was no impact at this time. The complainants are located west of the facility. The odor present downwind would not have travelled as far as the complainant's residences with a westerly wind. I met with complainant 01682 and some of his neighbors. The complainant was curious if the City of Freeport could confirm nuisance conditions. We discussed the situation for approximately an hour and a half. When I left there was still a moderate odor downwind.

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Mr. Jackson and I conducted a plant tour. The source of the hydrocarbon odor appeared to be in the tank farm area. We found that the piping from several of the tanks to the carbon absorber had come unattached. As stated before, these controls are not required, therefore this was not a violation. Mr. Jackson said that heavy winds a couple of days before must have knocked the piping loose. He said he would reconnect it that day.

These complaints were unconfirmed as a result of this investigation.



Rebecca E. Ohler

000806

Hercules Real Estate Corporation owns and operates a barge cleaning and repair facility on the Intercoastal Waterway in Freeport, Brazoria County. The facility has been at this location since the 1950s. Hercules bought the facility from Fish Engineering in 1989.

In 1982 Fish Engineering applied for a permit exemption to cover a proposed expansion of the barge cleaning facility. Permit exemption X-13561 was issued in 1982. A new heater was installed and is subject to the record keeping requirements of this exemption. The exemption also limits volatile organic compound (VOC) emissions from this facility to 17.4 tons per year.

In December 1991 Hercules requested an amendment to the permit exemption due to an increase in the number of barges cleaned from approximately 150 barges per year to 240. Hercules indicated the majority of additional barges contained caustic, not VOCs. The exemption was not amended because it is not allowable to amend exemptions.

In early 1992 Hercules submitted a permit application to the Austin office. A June 2, 1992 letter to Hercules documents receipt of the application and lists additional information which is required to proceed with the application. There is no response to the deficiency letter in the files.

In December 1993 another letter was sent informing Hercules that failure to submit the requested information within 45 days would result in the permit application being voided. Hercules responded with additional information January 6, 1994. According to TNRCC New Source Review, the response was so inadequate and did not contain the required information that on February 17, 1994 the application was administratively voided on the basis of no response to the deficiency notices.

Most of the emissions from this facility are from the barges while they are in the canal. At this time the compliance date for TNRCC regulations requiring control of barge emissions has not been reached. By November 15, 1996 Hercules will be required to capture and control the emissions from the degassing and stripping of the barges which have a capacity greater than or equal to 10,000 barrels (420,000 gallons). Hercules has indicated they intend to install a thermal oxidizer for this purpose. At that time a permit will be necessary.

000807

/26/96

SEARCH FOR : ..Hercules..

MASTER &amp; INVEST

Page 5

## MASTER TABLE

Complaint Num: 29501786  
NY FIELD: 1786  
Region Code: 12  
Occ Time: 13:15  
Effect: G  
Frequency: CURRENT  
Sig First Name: [REDACTED]  
Sig Last Name: [REDACTED]  
Sig Name 2: [REDACTED]  
Sig Address: [REDACTED]  
Sig City: [REDACTED]  
Sig State: TX  
Sig Phone: [REDACTED]  
Notify Brd Mtg:  
Nature Code: AR  
Initial Problem: O  
Very bad odors were coming from the Hercules facility yesterday about 9:30 am. The odors were so bad it gave complainant a headache. Complainant felt bad all day. Called today because the TNRCC phone number was left at home.  
Type Code: AR  
Status Code: NVN  
Closure Comments:  
Closure Date: 6/20/95  
Create: 6/19/95  
Last changed: 7/14/95  
Update code: C  
Account name: HERCULES  
Assigned to: HAW

Media: A  
County Code: 020  
Date Occurred: 6/14/95  
Number Complaining: 1  
Referred By:  
Form Code: T  
Rec Date: 6/15/95  
Priority: 3  
Confidential: Y  
Referred To:  
Orig Zip: [REDACTED]  
Orig Zip Suffix:  
Notify Resolved:

## INVEST TABLE

Invest Num: 000788A  
SN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
IC Code:  
IN:  
Investigator Code: HAW  
Investigator: TONY WILLIAMS  
Investigation Date: 6/20/95  
Investigation Time: 14:15  
Prob Description: Complaint was unconfirmed. See written report.  
Location: Freeport  
Subdivision:  
FFsite Y/N: Y  
Samples Sent:  
Permit-1:  
Permit-2:  
Contacted: 6/20/95  
Utility Type:  
Suspense Date:  
Isolation:  
asin:  
Registration num:  
SDB INVEST #: 054171A

Samples Returned:  
Docket Num:  
CCN Number:  
PWS Num:  
REG Number:  
RSegment:

000808

- ☒ Add  
☐ Change  
☐ Delete

☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
 White - Region/Local Program  
 Canary - Data Entry/Region  
 Pink - Investigator/Data Entry

**TNRCC INVESTIGATION/VIOLATION FORM**  
 (Boldfaced items are required)

<b>1</b>	Account Number <u>B L 0 1 1 8 Y</u> Account Name <u>HERCULES REAL ESTATE CORP</u> Date of Investigation (as MMDDYY) <u>062095</u> Off Hours: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Investigator Staffcode <u>HA W I</u> Permit(s) _____ Primary Investigator Juriscode <u>020</u> Other Juriscode 1 _____ Other Juriscode 2 _____ Site Name/Location <u>HERCULES CORPORATION / P.O. DRAWER 0, FREEPORT, 77541</u> Person Contacted/Phone _____
<b>2</b>	Investigation Number <u>054171A</u> Related Previous Investigation Number _____ Federal Program: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NSPS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NESHAP: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Situation Number _____ (COMPLIANCE DIV. ONLY) • Investigation Type <u>C O S Y</u> In-House Investigation: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No --EPN Comment <u>COMPLAINT #129501786 WAS UNCONFIRMED. ODORS WERE NOT DETECTED. NO VIOLATIONS WERE DOCUMENTED.</u> <p style="text-align: center;">&gt;&gt;&gt; FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY &lt;&lt;&lt;</p> Date Test Conducted (as MMDDYY) _____ Date Report Received (as MMDDYY) _____ Analysis Review Results (C,N,U) _____ Permits(s) _____ Retest Required: <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>3</b>	Investigation Number _____ Related Previous Investigation Number _____ Federal Program: <input type="checkbox"/> Yes <input type="checkbox"/> No NSPS: <input type="checkbox"/> Yes <input type="checkbox"/> No NESHAP: <input type="checkbox"/> Yes <input type="checkbox"/> No Situation Number _____ (COMPLIANCE DIV. ONLY) • Investigation Type _____ In-House Investigation: <input type="checkbox"/> Yes <input type="checkbox"/> No --EPN Comment _____
<b>4</b>	Investigation Number _____ Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No Violation Number _____ (changes/deletes only) Situation Number _____ (Compliance Div. only) Cause/Description _____ (Compliance Div. only) Rule Violated _____ Contamcode _____ Fill in the following applicable items: Permit Number _____ Permit Provision _____ Board Order Number _____ Court Order Number _____ CFR Part _____ • FIN Involved _____ Facility Name (optional) _____ Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger Date NOV Sent (as MMDDYY) _____ Date NOV Received (as MMDDYY) _____ (defaults to 5 days after date NOV sent)
<b>4</b>	Investigation Number _____ Local Ordinance: <input type="checkbox"/> Yes <input type="checkbox"/> No Violation Number _____ (changes/deletes only) Situation Number _____ (Compliance Div. only) Cause/Description _____ (Compliance Div. only) Rule Violated _____ Contamcode _____ Fill in the following applicable items: Permit Number _____ Permit Provision _____ Board Order Number _____ Court Order Number _____ CFR Part _____ • FIN Involved _____ Facility Name (optional) _____ Violation Type: <input type="checkbox"/> Clerical <input type="checkbox"/> Non-Clerical <input type="checkbox"/> Imminent Danger Date NOV Sent (as MMDDYY) _____ Date NOV Received (as MMDDYY) _____ (defaults to 5 days after date NOV sent)

000809

- See back for valid codes and investigation type codes matrix
- EPN required for investigation types indicated on back with an \*
- FIN required for VOC violations as indicated with a + in the user's manual rule table

Investigator signature [Signature]  
 Approved by [Signature]

Date 6-20-95  
 Date 6-30-95

## Investigative Summary

An investigation was conducted on June 20, 1995, at Hercules Corporation, 906 Marlin, in Freeport, Brazoria County, at 2:15 PM, in response to complaint #129501786, received on June 15, 1995. The complainant alleged that a nuisance odor was detected and that adverse health effects were experienced, such as headaches. During the investigation, odors were not detected. No adverse physical effects were experienced. There were no barge cleaning activities conducted during the investigation. An interview with Larry Ballinger, Sales Manager, along with a review of the facility records, revealed that there were no cleaning or repair operations conducted on June 14, 1995. The facility has been grandfathered and appears to be in compliance with all applicable TNRCC Rules. The complainant was notified of the results of the investigation on June 20, 1995. Complaint #129501769 was unconfirmed and no violations were documented.



H.A. Williams  
Environmental Quality Specialist  
TNRCC Houston Regional Office

000810

## Investigative Summary

An investigation was conducted on June 20, 1995, at Hercules Corporation, 906 Marlin, in Freeport, Brazoria County, at 2:15 PM, in response to complaint #129501786, received on June 15, 1995. The complainant alleged that a nuisance odor was detected and that adverse health effects were experienced, such as headaches. During the investigation, odors were not detected. No adverse physical effects were experienced. There were no barge cleaning activities conducted during the investigation. An interview with Larry Ballinger, Sales Manager, along with a review of the facility records, revealed that there were no cleaning or repair operations conducted on June 14, 1995. The facility has been grandfathered and appears to be in compliance with all applicable TNRCC Rules. The complainant was notified of the results of the investigation on June 20, 1995. Complaint #129501769 was unconfirmed and no violations were documented.



H.A. Williams  
Environmental Quality Specialist  
TNRCC Houston Regional Office



3/27/96

Page 2

COMPLAINT NUM: 129501648  
Invest Num: 000594A  
SN: 00024239  
Account Name: HERCULES REAL ESTATE CORPORATION  
Account Num: BL0118V  
IC Code:  
IN:  
Investigator Code: CCB  
Investigator: CANDACE BARTLETT  
Investigation Date: 3/09/95  
Investigation Time: 12:35  
Job Description: The c  
Location: Surfs  
Subdivision:  
FFSITE Y/N: Y  
Samples Sent:  
Samples Returned:  
Permit-1:  
Permit-2:  
Contacted: 3/03/95  
Ticket Num:  
WS Num:  
Utility Type:  
CN Number:  
EG Number:  
Suspense Date:  
Violation:  
Basin:  
Segment:  
Registration num:  
SDB INVEST #: 043495A  
Complaint Num-1: 129501648  
KEY FIELD: 1648  
Media: A  
Form Code: T  
Region Code: 12  
County Code: 020  
Rec Date: 2/23/95  
Rec Time: 11:00  
Date Occurred: 2/23/95  
Priority: 3  
Effect: H  
Number Complaining: 1  
Confidential: Y  
Frequency: INTERMITTENT  
Referred By:  
Referred To:  
Orig First Name: Bob  
Orig Last Name: Casale

000812

1/27/96

Page 3

ig Name 2:  
ig Address:  
ig City:  
ig State:  
ig Zip:  
ig Zip Suffix:  
ig Phone:  
t Phone:  
otify Brd Mtg:  
otify Resolved:  
ature Code: 0  
age:  
nitial Problem: Hercu  
ype Code: AR  
tatus Code: NVN  
losure Comments:  
losure Date: 3/09/95  
inal Letter:  
reate: 4/12/95  
ast changed: 4/20/95  
pdate code: C  
ccount name-1: HERCULES  
ssigned to: CCB

000813

3/26/96

MASTER &amp; INVEST

Page 1

SEARCH FOR : ..Hercules..

## MASTER TABLE

Complaint Num: 2129501648  
CY FIELD: 1648  
Region Code: 12  
Rec Time: 11:00  
Effect: H  
Frequency: INTERMITTENT  
Orig First Name: Bob  
Orig Last Name: Casale  
Orig Name 2:  
Orig Address:  
Orig City:  
Orig State:  
Orig Phone:  
Notify Brd Mtg:  
ature Code:  
Initial Problem: O  
Hercules Barge Cleaning is creating periodic odors from operations. Noticed first event about a week ago. Wife later got the flu. Odor is bad today. I later called to check on status of wife and she was not aware of odor.  
Type Code: AR  
Status Code: NVN  
Closure Comments:  
Closure Date: 3/09/95  
reate: 4/12/95  
ast changed: 4/20/95  
pdate code: C  
ccount name: HERCULES  
ssigned to: CCB

Media: A  
County Code: 020  
Date Occurred: 2/23/95  
Number Complaining: 1  
Referred By:  
Form Code: T  
Rec Date: 2/23/95  
Priority: 3  
Confidential: Y  
Referred To:  
Orig Zip:  
Alt Phone:  
Notify Resolved:  
Orig Zip Suffix:

## INVEST TABLE

Invest Num: 000594A  
SN: 00024239  
ccount Name: HERCULES REAL ESTATE CORPORATION  
ccount Num: BL0118V  
IC Code:  
IN:  
Investigator Code: CCB  
Investigator: CANDACE BARTLETT  
Investigation Date: 3/09/95  
Investigation Time: 12:35  
Prob Description: The complaint is unconfirmed. See attached investigator's report.  
Location: Surfside, near Snapper Lane  
Subdivision:  
Offsite Y/N: Y  
Samples Sent:  
Permit-1:  
Contacted: 3/03/95  
Utility Type:  
Suspense Date:  
Violation:  
Basin:  
Registration num:  
PSDB INVEST #: 043495A

Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:  
PWS Num:  
REG Number:  
RSegment:

000814

- ☒ Add  
☐ Change  
☐ Delete

☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

DISTRIBUTION:  
 White - Region/Local Programs  
 Canary - Data Entry/Region  
 Pink - Investigation Data Entry

# TNRCC INVESTIGATION/VIOLATION FORM

(Boldfaced items are required) *Real Estate*

Account Number B40118 V Account Name Hercules Marine Services Corporation  
 Date of Investigation (as MMDDYY) 030995 Off Hours: ☐ Yes ☒ No  
 1 Investigator Staffcode CCB1 Permit(s) \_\_\_\_\_  
 Primary Investigator Juriscode 120 Other Juriscode 1 \_\_\_\_\_ Other Juriscode 2 \_\_\_\_\_  
 Site Name/Location Hercules Marine Services Corp. / Surfside  
 Person Contacted/Phone Larry Ballinger / 409-233-6371

Investigation Number 043495H Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 • Investigation Type CD SV In-House Investigation: ☐ Yes ☒ No \*\*EPN  
 2 Comment COMPLAINT NO. 129501648 is unconfirmed. NO odors were detected. NO nuisance observed. NO NOV will be issued.  
 >>> FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY <<<  
 Date Test Conducted (as MMDDYY) \_\_\_\_\_ Date Report Received (as MMDDYY) \_\_\_\_\_  
 Analysis Review Results (C,N,U) \_\_\_\_\_ Permits(s) \_\_\_\_\_ Retest Required: ☐ Yes ☐ No

Investigation Number \_\_\_\_\_ Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 3 • Investigation Type \_\_\_\_\_ In-House Investigation: ☐ Yes ☐ No \*\*EPN  
 Comment \_\_\_\_\_

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 4 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 • FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 4 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 • FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

- See back for valid codes and investigation type codes matrix
- EPN required for investigation types indicated on back with an \*
- FIN required for VOC violations as indicated with a + in the user's manual rule table

000815

Investigator signature Candace C. Bartlett  
 Approved by [Signature]

Date 3-22-95  
 Date 3-23-95

Investigator's Comment  
Hercules Marine Services Corp.  
Freeport, Brazoria County  
Investigation No. 042415A

BL-0118-V  
03-14-95  
Page 5

Purpose: This investigation was conducted on March 9, 1995 in response to complaint No. 12951648. The complaint was received at the TNRCC Region 12 office February 23, 1995. The complainant alleged that periodic odors from Hercules Marine Services Corporation located at 906 Marlin Lane in Brazoria County was causing a nuisance.

Investigation: Candace Bartlett and Carol Harkins arrived at Hercules at 12:35 p.m. on March 9, 1995. The wind was blowing out of the northeast at approximately 11 mph. The day was clear with no cloud cover. Before entering the facility an odor survey was conducted by driving downwind of the facility. No odor of any kind was detected. We entered the facility and met with Mr. Larry Ballinger, the Co-Manager of Hercules Marine Services. I informed him of the complaint and the result of the odor survey. Mr. Ballinger told me that he had visited with a complainant on March 1, 1995. He said that they walked on hardpoint #1 towards the bulkhead to determine if any odor could be detected. Mr. Ballinger stated that this complainant said that an odor could be detected intermittently while on the property; however he could not detect anything. On that day Mr. Ballinger informed that they were servicing a barge that contained caustic.

I requested to review company records for the two week period February 13-24, 1995 because the complaint alleged that the odor problems started a week before the complaint was called into the Region 12 office. Review of the records indicated that Hercules was cleaning out barges using hot and cold water washes. On 2-15-95 they serviced a barge from Dixie Carriers which contained styrene. On 2-20-95 they stripped and blow dried the Rio-400 barge which contained styrene. On 2-22-95 the Dixie Carriers barge which contained cumene was cold water washed and the BASF barge in which the last product stored was butanol was serviced. The records indicated everything was in order. After examining company records, we walked outside toward the bulkhead where a barge had recently been cleaned. I could smell a chemical like odor intermittently near the barge; however, as mentioned before the odor was not detected off of the property.

Conclusion: Complaint No. 12951648 is unconfirmed. The odor survey conducted resulted in no detection of odors. Therefore, a nuisance condition was not established. Review of company records indicated no problems. The complainant was notified of the investigation results 3-14-95. No Notice of

Violation will b issued.

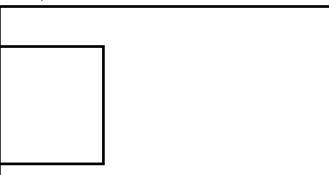




*Candace C. Bartlett*

Candace C. Bartlett  
Environmental Quality Specialist  
Region 12

000817

/27/96

Page 1

XPAYER#: 000000000000  
VEST\_PREFIX: EF  
VESTIGATION#: 881000432  
RECEIVED\_DATE: 19881007  
ORIGINATOR\_NAME1: CASALE, BOB  
ORIGINATOR\_NAME2:  
ORIG\_ADDRESS:   
ORIG\_CITY:   
ORIG\_STATE:   
ORIG\_ZIP:   
ORIG\_PHONE:   
INVESTIGATOR:  
ENTITY\_NAME: FISH ENGINEERING  
REFERENCE:  
ENTITY\_ADDRESS: MARLIN LANE  
ENTITY\_CITY: FREEPORT  
ENTITY\_STATE: TX  
ENTITY\_ZIP: 775410000  
ENTITY\_PHONE: 0000000000  
PROBLEM\_DESC1: NUISANCE AIR RELEASE FROM  
PROBLEM\_DESC2: BARGES.  
PROBLEM\_DESC3:  
LOCATION:  
RESOLUTION\_ACT1: REFERRED TO TACB  
RESOLUTION\_ACT2:  
RESOLUTION\_ACT3:  
PERMIT\_1:  
PERMIT\_2:  
FINAL\_LETTER\_DATE: 00000000  
RESOLVED\_DATE: 19881007  
CONTACTED\_DATE: 00000000  
TYPE\_CODE: IN  
NATURE\_CODE: OO  
INVEST\_STATUS: CLO  
DISTRICT\_REGION: 07  
COUNTY\_CODE: 020  
ASIN: 12  
SEGMENT: 1200  
LIST\_FLAG:

*Casales  
but not  
Heroules*

000818

Investigator's Comment  
Hercules Marine Services Corp.  
Freeport, Brazoria County  
Investigation No. 04-11-A

BL-0118-V  
03-14-95  
Page 5

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violation will be issued.

*Candace C. Bartlett*

Candace C. Bartlett  
Environmental Quality Specialist  
Region 12

000820

9/27/96

Page 2

AXPAYER#: 000000000000  
NVEST\_PREFIX: EF  
NVESTIGATION#: 930400827  
ECEIVED\_DATE: 19930414  
RIGINATOR\_NAME1: CASALE, BOB  
RIGINATOR\_NAME2:  
RIG\_ADDRESS:   
RIG\_CITY:   
RIG\_STATE:   
RIG\_ZIP:   
RIG\_PHONE:   
NVESTIGATOR: RICE, JAMES A.  
NTITY\_NAME: HERCULES OFFSHORE DRILLING  
REFERENCE:  
NTITY\_ADDRESS:  
NTITY\_CITY:  
NTITY\_STATE:  
NTITY\_ZIP: 0000000000  
NTITY\_PHONE: 0000000000  
PROBLEM\_DESC1: SAND BLASTING DEBRIS IS  
PROBLEM\_DESC2: FALLING INTO WATER  
PROBLEM\_DESC3:  
LOCATION: FREEPORT N.INTERCOASTAL W  
RESOLUTION\_ACT1: NO EVIDENCE OF THE ALLEGED PRO  
RESOLUTION\_ACT2: BLEM WAS OBSERVED.  
RESOLUTION\_ACT3:  
PERMIT\_1:  
PERMIT\_2:  
FINAL\_LETTER\_DATE: 19930427  
RESOLVED\_DATE: 19930427  
CONTACTED\_DATE: 19930414  
TYPE\_CODE: IN  
NATURE\_CODE: SR  
NVEST\_STATUS: CLO  
DISTRICT\_REGION: 07  
COUNTY\_CODE: 020  
BASIN: 11  
SEGMENT: 1109  
LIST\_FLAG:

000821

/26/96

History table  
SEARCH FOR : ..Hercules..

Page 3

XPAYER#: 000000000000  
VEST\_PREFIX: EF  
VESTIGATION#: 930400827  
CEIVED DATE: 19930414  
IGINATOR\_NAME1: CASALE, BOB  
IGINATOR\_NAME2:  
IG\_ADDRESS:  
IG\_CITY:  
IG\_STATE:  
IG\_ZIP:  
IG\_PHONE:  
VESTIGATOR: RICE, JAMES A.  
TITY\_NAME: HERCULES OFFSHORE DRILLING  
REFERENCE:  
TITY\_ADDRESS:  
TITY\_CITY:  
TITY\_STATE:  
TITY\_ZIP: 0000000000  
TITY\_PHONE: 0000000000  
ROBLEM\_DESC1: SAND BLASTING DEBRIS IS  
ROBLEM\_DESC2: FALLING INTO WATER  
ROBLEM\_DESC3:  
LOCATION: FREEPORT N.INTERCOASTAL W  
ESOLUTION\_ACT1: NO EVIDENCE OF THE ALLEGED PRO  
ESOLUTION\_ACT2: BLEM WAS OBSERVED.  
ESOLUTION\_ACT3:  
ERMIT\_1:  
ERMIT\_2:  
INAL LETTER DATE: 19930427  
ESOLVED DATE: 19930427  
ONTACTED DATE: 19930414  
YPE\_CODE: IN  
ATURE\_CODE: SR  
NVEST\_STATUS: CLO  
ISTRICT\_REGION: 07  
DUNTY\_CODE: 020  
ASIN: 11  
\_SEGMENT: 1109  
IST\_FLAG:

000822

Boil. range: \_\_\_\_\_  
Vapor pressure @ 10°C (68°F) \_\_\_\_\_  
25°C (77°F) \_\_\_\_\_

## Material Safety Data Sheet

Chem. Equip. other T. \_\_\_\_\_  
%? \_\_\_\_\_

Page : 1

BASF CORPORATION  
3000 CONTINENTAL DRIVE  
MT. OLIVE, NJ 07828  
(201) 426-4671 X5053

Original Date: 10/02/1992  
Revision Date: 09/15/1995

Emergency Telephone: (800) 424-9300 (CHEMTREC)  
(800) 832-HELP (BASF Hotline)

BOTH NUMBERS ARE AVAILABLE DAYS, NIGHTS, WEEKENDS, & HOLIDAYS.

### SECTION 1 - PRODUCT INFORMATION

ANOLON®

Product ID: NCO 526172

Common Chemical Name:

N/A

Synonyms:

Cyclohexanone/Cyclohexanol Mixture

Molecular Formula:

MIXTURE

Molecular Wt.: NOT APPLICABLE

Chemical Family: Cyclic Ketone and Alcohol

### SECTION 2 - INGREDIENTS

Chemical Name:	CAS	Amount
Cyclohexanol	108-93-0	- 60.0 %
ACGIH TLV	TWA 50 PPM	
OSHA PEL	TWA 50 PPM	
Cyclohexanone	108-94-1	- 40.0 %
ACGIH TLV	SKIN	
	TWA 25 PPM	
OSHA PEL	TWA 50 PPM	

### SECTION 3 - PHYSICAL PROPERTIES

Color: Pale Yellow  
Form/Appearance: Liquid  
Odor: Camphor

Specific Gravity: Typical 0.941 Low/High U.O.M.  
pH: NOT AVAILABLE

Boiling Pt: Typical 175 - 165 Deg. @ Pressure  
Freezing Pt: NOT AVAILABLE 32 C 760 MM HG  
Decomp. Tmp: NOT AVAILABLE 288 C

Solubility: Typical 3.6 - 9 U.O.M. @ Temperature  
G/100 G WA 20 C

000823

2.9 milbars @ 20°C

#### SECTION 4 - FIRE AND EXPLOSION DATA

	Typical	Low/High	Deg.	Method
Flash Point:	50.6			C TAG CLOSED CUP
Autoignition:	300			C NOT SPECIFIED
Flam. Limits:		1.1 - 8.1	%	

##### Extinguishing Media:

Water fog, alcohol foam, CO2 or dry chemical extinguishing media.

##### Fire Fighting Procedures:

Firefighters should be equipped with self-contained breathing apparatus and turn out gear. Water may be ineffective but should be used to keep exposed containers cool.

##### Unusual Hazards:

Vapors from heated (above flashpoint) of product may travel to a source of ignition and flash back.

#### SECTION 5 - HEALTH EFFECTS

Routes of entry for solids and liquids include eye and skin contact, ingestion and inhalation. Routes of entry for gases include inhalation and eye contact. Skin contact may be a route of entry for liquified gases.

##### Acute Overexposure Effects:

Contact with the eyes may result in moderate to severe irritation and corneal injury. Contact with the skin results in moderate irritation; prolonged or repeated contact may cause dermatitis. Material may also be skin absorbed.

Inhalation of cyclohexanone vapors may cause narcosis, headache, drowsiness, tremors and other CNS effects. Cyclohexanone vapors may cause mild irritation to the eyes. Cyclohexanone can be skin absorbed.

##### Chronic Overexposure Effects:

Based on animal studies, overexposure to cyclohexanol by ingestion, inhalation or absorption can cause CNS depression, lacrimation, nausea, tremors or convulsions. Repeated overexposures in animals also caused tissue damage to the liver, kidney and heart. Guinea pigs exposed to 4000 ppm of cyclohexanone for a 6-hour period showed signs of CNS depression, lacrimation, salivation, depression of body temperature and respiratory heart rate, and opacity of the cornea. Mice, guinea pigs, and cats exposed to 3800 ppm exhibited the same effects. Based on animal studies, overexposure could lead to liver and/or kidney damage.

##### First Aid Procedures - Skin:

Wash affected areas with soap and water. Remove and launder contaminated clothing before reuse. Get immediate medical attention.

##### First Aid Procedures - Eyes:

Immediately rinse eyes with running water for 15 minutes. Get immediate medical attention.

##### First Aid Procedures - Ingestion:

If swallowed, dilute with water and immediately induce vomiting. Never give fluids or induce vomiting if the victim is unconscious or having convulsions. Get immediate medical attention.

#### **SECTION 5 - HEALTH EFFECTS (cont)**

---

**First Aid Procedures - Inhalation:**

Move to fresh air. Aid in breathing, if necessary, and get immediate medical attention.

**First Aid Procedures - Notes to Physicians:**

None known.

**First Aid Procedures - Aggravated Medical Conditions:**

No data is available which addresses medical conditions that are generally recognized as being aggravated by exposure to this product. Please refer to Section 5 (Effects of Overexposure) for effects observed in animals.

**First Aid Procedures - Special Precautions:**

None

#### **SECTION 6 - REACTIVITY DATA**

---

**Stability Data:**

Stable

**Incompatibility:**

Oxidizing/reducing agents, plastics, resins, rubber.

**Conditions/Hazards to Avoid:**

Avoid excessive heat and ignition sources.

**Hazardous Decomposition/Polymerization:**

Hazardous polymerization does not occur. Material is stable under normal conditions. Decomposition products are CO and CO<sub>2</sub>.

**Corrosive Properties:**

Not corrosive.

**Oxidizer Properties:**

Not an oxidizer

**Other Reactivity Data:**

None known.

#### **SECTION 7 - PERSONAL PROTECTION**

---

**Clothing:**

Gloves, coveralls, apron, and boots as necessary to prevent contact.

**Eyes:**

Chemical goggles; also wear a face shield if splashing hazard exists.

**Respiration:**

If vapors or mists are generated, wear a NIOSH/MSHA approved organic vapor/mist respirator. Use an air-supplied or self-contained breathing apparatus in emergency or non-routine, high exposure situations.

**Ventilation:**

Use local exhaust to control to recommended P.E.L.

**Explosion Proofing:**

Tools should be non-sparking. Exhaust fans should be explosion proof.

**Other Personal Protection Data:**

Eyewash fountains and safety showers must be easily accessible.

#### **SECTION 8 - SPILL-LEAK/ENVIRONMENTAL**

---

**General:**

Spills should be contained, solidified and placed in suitable

000825

#### SECTION 8 - SPILL-LEAK/ENVIRONMENTAL (cont)

containers for disposal in a RCRA licensed facility. This material is RCRA hazardous due to its properties.

**Waste Disposal:**

Incinerate at a RCRA licensed facility. Do not discharge into waterways or sewer systems without proper authority.

**Container Disposal:**

Empty containers with less than 1 inch of residue may be landfilled at a licensed facility. Recommend crushing or other means to prevent unauthorized reuse. Other containers must be disposed of in a RCRA licensed facility.

#### SECTION 9 - STORAGE AND HANDLING

**General:**

Avoid excessive heat or sources of ignition. Store in clean, cool, well-ventilated no-smoking area in sealed and grounded containers.

#### SECTION 10 - REGULATORY INFORMATION

**TSCA Inventory Status**

Listed on Inventory: YES

RCRA Haz. Waste No.: D001

CERCLA: YES Reportable Qty.: (If YES) 5000 LBS

The RCRA hazardous waste number D001 refers to this material's RCRA hazardous waste characteristic of ignitibility.

**Hazard Ratings:**

	Health:	Fire:	Reactivity:	Special:
HMIS	2	2	0	NA

This product is hazardous or contains components which are hazardous according to the OSHA Hazard Communication Standard.

#### SECTION 11 - TRANSPORTATION INFORMATION

**DOT Proper Shipping Name:**

REFER TO BASF BILL OF LADING

**DOT Technical Name:**

REFER TO BASF BILL OF LADING

**DOT Primary Hazard Class:**

REFER TO BASF BILL OF LADING

**DOT Secondary Hazard Class:**

REFER TO BASF BILL OF LADING

**DOT Label Required:**

REFER TO BASF BILL OF LADING

**DOT Placard Required:**

REFER TO BASF BILL OF LADING

**DOT Poison Constituent:**

REFER TO BASF BILL OF LADING

BASF Commodity Codes: NA NA UN/NA Code: 1993 E/R Guide:

**Bill of Lading Description:**

FOR THE MOST UP-TO-DATE D.O.T. SHIPPING DESCRIPTION, PLEASE REFER TO

ANOLON®  
NCO 526172

Page : 5

**SECTION 11 - TRANSPORTATION INFORMATION (cont)**

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**THE BASF BILL OF LADING!**

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END OF DATA SHEET

000827



1/27/96

COMPLAINT NUM: 129600372  
 Invest Num: 001230A  
 SN: 00024239  
 Account Name: HERCULES REAL ESTATE CORPORATION  
 Account Num: BL0118V  
 IC Code:  
 IN:  
 Investigator Code: CCB  
 Investigator: CANDACE BARTLETT  
 Investigation Date: 12/07/95  
 Investigation Time: 24:00  
 Job Description: The c  
 Location: Marli  
 Subdivision:  
 Offsite Y/N: Y  
 Samples Sent:  
 Samples Returned:  
 Permit-1:  
 Permit-2:  
 Contacted: 12/07/95  
 Pocket Num:  
 WS Num:  
 Utility Type:  
 CN Number:  
 EG Number:  
 Suspense Date:  
 Isolation:  
 Asin:  
 Segment:  
 Registration num:  
 SDB INVEST #: 065619A  
 Complaint Num-1: 129600372  
 EY FIELD: 372  
 Media: A  
 Form Code: T  
 Region Code: 12  
 County Code: 020  
 Rec Date: 12/07/95  
 Rec Time: 10:00  
 Date Occurred: 12/07/95  
 Priority: 1  
 Effect: G  
 Number Complaining: 1  
 Confidential: Y  
 Frequency: CURRENT  
 Referred By:  
 Referred To:  
 Orig First Name: Bob  
 Orig Last Name: Casale

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ig Name 2:  
ig Address: ne  
ig City:   
ig State:   
ig Zip:  
ig Zip Suffi  
ig Phone:   
t. Phone:  
stify Brd Mtg:  
stify Resolved:  
ature Code: D  
age:  
nitial Problem: Sandb  
pe Code: AR  
atus Code: NVN  
losure Comments:  
losure Date: 12/07/95  
inal Letter:  
reate: 1/08/96  
ast changed: 1/24/96  
pdate code: C  
ccount name-1: HERCULES OFFSHORE CORP  
assigned to: CCB

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1/26/96

SEARCH FOR : ..Hercules..

MASTER &amp; INVEST

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## MASTER TABLE

Complaint Num: I29600372  
BY FIELD: 372  
Region Code: 12  
Ac Time: 10:00  
Effect: G  
Frequency: CURRENT  
Orig First Name: Bob  
Orig Last Name: Casale  
Orig Name 2:  
Orig Address:  
Orig City:  
Orig State:  
Orig Phone:  
Notify Brd Mtg:  
ature Code: D  
Initial Problem: Sandblasting from Hercules is causing a nuisance.  
ype Code: AR  
tatus Code: NVN  
losure Comments:  
losure Date: 12/07/95  
reate: 1/08/96  
ast changed: 1/24/96  
pdate code: C  
ccount name: HERCULES OFFSHORE CORP  
ssigned to: CCB

Media: A  
County Code: 020  
Date Occurred: 12/07/95  
Number Complaining: 1  
Referred By:

Form Code: T  
Rec Date: 12/07/95  
Priority: 1  
Confidential: Y  
Referred To:

Orig Zip:  
Alt Phone:  
Notify Resolved:

Orig Zip Suffix:

## INVEST TABLE

nvest Num: 001230A  
SN: 00024239  
ccount Name: HERCULES REAL ESTATE CORPORATION  
ccount Num: BL0118V  
IC Code:  
IN:  
nvestigator Code: CCB  
Investigator: CANDACE BARTLETT  
nvestigation Date: 12/07/95  
Investigation Time: 24:00  
rob Description: The complaint is unconfirmed for a nuisance created by excessive dust. Facility was sandblasting but I could not confirm that it was adversely affecting the complainant. No NOV will be issued to the facility.  
ocation: Marlin Lane  
ubdivision:  
ffsite Y/N: Y  
amples Sent:  
ermit-1:  
ontacted: 12/07/95  
ility Type:  
uspense Date:  
iolation:  
asin:  
egistration num:  
SDB INVEST #: 065619A

Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:

PWS Num:  
REG Number:

RSegment:

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SEARCH FOR : ..Hercules..

MASTER &amp; INVEST

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## MASTER TABLE

mplaint Num: 129501681  
Y FIELD: 1681  
gion Code: 12  
c Time: 14:10  
fect: G  
equency: PAST  
ig First Name: [REDACTED]  
ig Last Name: [REDACTED]  
ig Name 2: [REDACTED]  
ig Address: [REDACTED]  
ig City: [REDACTED]  
ig State: [REDACTED]  
ig Phone: [REDACTED]  
otify Brd Mtg:  
ature Code:  
itial Problem: O  
Vapors from barge cleaning at Hercules are impacting complainant and might be harmful. Problem called into the City of Freeport Building and Health Department at about 1:00 pm on 3/27/95. Please forward a copy of the report (non-confidential version) to City of Freeport, Attention Ron Gaines, Building and Health Dept. Freeport, TX 77541  
ype Code: AR  
atus Code: NVN  
losure Comments:  
losure Date: 5/09/95  
reate: 4/13/95  
st changed: 7/14/95  
odate code: C  
ccount name: HERCULES  
signed to: REO

Media: A  
County Code: 020  
Date Occurred: 3/27/95  
Number Complaining: 1  
Referred By: CI

Form Code: T  
Rec Date: 3/29/95  
Priority: 3  
Confidential: Y  
Referred To:

Orig Zip: [REDACTED]  
Alt Phone:  
Notify Resolved:

Orig Zip Suffix:

Final Letter:

## INVEST TABLE

invest Num: 000722A  
SN: 00024239  
ccount Name: HERCULES REAL ESTATE CORPORATION  
ccount Num: BL0118V  
IC Code:  
IN:  
investigator Code: REO  
Investigation Date: 5/09/95  
rob Description: Unconfirmed. See written report.  
ocation: 906 Marlin Drive, Freeport  
ubdivision:  
ffsite Y/N: Y  
amples Sent:  
ermit-1:  
ontacted: 5/11/95  
ility Type:  
uspense Date:  
iolation:  
asin:  
egistration num:  
SDB INVEST #: 051815A

Investigator: BECKY OHLER  
Investigation Time: 10:45

Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:

PWS Num:  
REG Number:

RSegment:

000831

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History table  
SEARCH FOR : ..Hercules..

Page 2

XPAYER#: 00000000000  
 INVEST\_PREFIX: EF  
 INVESTIGATION#: 900400407  
 RECEIVED\_DATE: 19891009  
 ORIGINATOR\_NAME1: ANONYMOUS  
 ORIGINATOR\_NAME2:  
 RIG\_ADDRESS:  
 RIG\_CITY:  
 RIG\_STATE:  
 RIG\_ZIP: 0000000000  
 RIG\_PHONE: 0000000000  
 INVESTIGATOR: RAHMAN, ATA UR  
 ENTITY\_NAME: HERCULES OFFSHORE DRILLING CO.  
 REFERENCE: ABANDONED SITE ON LETTIE ST  
 ENTITY\_ADDRESS: OFF OF TELEPHONE ROAD  
 ENTITY\_CITY:  
 ENTITY\_STATE:  
 ENTITY\_ZIP: 0000000000  
 ENTITY\_PHONE: 0000000000  
 PROBLEM\_DESC1: THE ABANDONED SITE IS LITTERED  
 PROBLEM\_DESC2: WITH PARTIALLY EMPTY DRUMS &  
 PROBLEM\_DESC3: BUCKETS CONTAINING CHEMICALS  
 LOCATION: LETTIE ST  
 RESOLUTION\_ACT1: CO SUBMITTED FINAL CLEAN-UP LE  
 RESOLUTION\_ACT2: TTER &L SUPPORTING DOCUMENTS  
 RESOLUTION\_ACT3:  
 ERMIT\_1: 30141  
 ERMIT\_2:  
 FINAL\_LETTER\_DATE: 00000000  
 RESOLVED\_DATE: 19900925  
 CONTACTED\_DATE: 00000000  
 TYPE\_CODE: IN  
 FEATURE\_CODE: SW  
 INVEST\_STATUS: CLO  
 DISTRICT\_REGION: 07  
 COUNTY\_CODE: 101  
 ASIN: 10  
 SEGMENT: 1007  
 LIST\_FLAG:

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MASTER &amp; INVEST

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## MASTER TABLE

Complaint Num: 129600420  
Y FIELD: 420  
Region Code: 12  
C Time: 10:45  
Effect: G  
Frequency: CURRENT  
Sig First Name: Anonymous  
Sig Last Name:  
Sig Name 2:  
Sig Address:  
Sig City:  
Sig State:  
Sig Phone:  
Notify Brd Mtg:  
Ture Code:  
Initial Problem: Hercules Marine Services company conducts sand blasting without using any tarpauline to contain sand dust. This is causing dust nuisance in the sub division in the vicinity.  
pe Code: AR  
atus Code: NVN  
osure Comments:  
osure Date: 3/14/96  
eate: 2/21/96  
st changed: 5/13/96  
date code: C  
count name: HERCULES MARINE SEVICES  
signed to: REO

Media: A  
County Code: 020  
Date Occurred: 2/13/96  
Number Complaining: 1  
Referred By:  
Form Code: T  
Rec Date: 2/14/96  
Priority: 4  
Confidential: Y  
Referred To:  
Orig Zip:  
Alt Phone:  
Notify Resolved:  
Orig Zip Suffix:

Final Letter:  
HERCULES MARINE SEVICES  
REO

## INVEST TABLE

Invest Num: 001415A  
IN: 00024239  
Count Name: HERCULES REAL ESTATE CORPORATION  
Count Num: BL0118V  
C Code:  
IN:  
Investigator Code: REO  
Investigation Date: 3/14/96  
Job Description: No sandblasting activity during any of the three times the site was visited. No significant odor was coming from the facility either. Complaint is unconfirmed.  
Location: 906 Marlin, Freeport 77541  
Subdivision:  
Site Y/N: Y  
Samples Sent:  
Permit-1:  
Contacted:  
Utility Type:  
Expense Date:  
Isolation:  
asin:  
Registration num:  
SDB INVEST #: 073036A

Investigator: BECKY OHLER  
Investigation Time: 09:30  
Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:  
PWS Num:  
REG Number:  
RSegment:

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3/26/96

SEARCH FOR : ..Hercules..

MASTER &amp; INVEST

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## MASTER TABLE

Complaint Num: 129600443  
BY FIELD: 443  
Region Code: 12  
ec Time: 11:30  
Effect: G  
Frequency: CURRENT  
Orig First Name: [REDACTED]  
Orig Last Name: [REDACTED]  
Orig Name 2: [REDACTED]  
Orig Address: [REDACTED]  
Orig City: [REDACTED]  
Orig State: [REDACTED]  
Orig Phone: [REDACTED]  
otify Brd Mtg: [REDACTED]  
ature Code: D  
Initial Problem: Sandblasting activity from Hercules Marine Service without tarps is causing particulates residuals to settle all over property, e.g., pool, and patio furniture. Potential health problems by breathing these particulates.  
ype Code: AR  
tatus Code: NVN  
losure Comments:  
losure Date: 4/03/96  
reate: 5/13/96  
ast changed: 5/13/96  
pdate code: C  
ccount name: HERCULES MARINE SERVICES  
assigned to: CLH

Media: A  
County Code: 020  
Date Occurred: 3/20/96  
Number Complaining: 1  
Referred By: [REDACTED]

Form Code: T  
Rec Date: 3/20/96  
Priority: 4  
Confidential: Y  
Referred To: [REDACTED]

Orig Zip: [REDACTED]  
Alt Phone: [REDACTED]  
Notify Resolved: [REDACTED]  
Orig Zip Suffix: [REDACTED]

## INVEST TABLE

nvest Num: 001425A  
SN: 00024239  
ccount Name: HERCULES REAL ESTATE CORPORATION  
ccount Num: BL0118V  
IC Code:  
IN:  
nvestigator Code: CLH  
nvestigation Date: 3/28/96  
rob Description: This complaint was unconfirmed for alleged sandblasting nuisance, see report.  
ocation: 906 Marlin  
ubdivision:  
ffsite Y/N: Y  
amples Sent:  
ermit-1:  
ontacted: 4/03/96  
tility Type:  
uspense Date:  
iolation:  
asin:  
egistration num:  
SDB INVEST #: 073035A

Investigator: CAROL HARKINS  
Investigation Time: 10:20  
Samples Returned:  
Permit-2:  
Docket Num:  
CCN Number:  
RSegment:

PWS Num:  
REG Number:

000834

Investigator's Comments  
Hercules Marine Services Corp.  
Surfside, Brazoria County  
Investigation No. 068464

BL-0118-V  
12-20-95  
Page 1

I. Introduction and Summary

A. Introduction

On December 20, 1995, SIP investigation was conducted at the Hercules Marine Services Corporation to determine the compliance status with applicable Texas Natural Resource Conservation Commission (TNRCC) Rules and Regulations. Mr. Larry Ballinger represented the company. The TNRCC was represented by Air Compliance Section investigators Ms. Candace C. Bartlett and Mr. Nathaniel Grace.

B. Investigation Summary

This facility was found to be in compliance with all applicable Texas Natural Resource Conservation Commission (TNRCC) Rules and Regulations.

II. Process Description and Flow Diagram

See Attachments I and II.

III. TNRCC Regulation Review and Compliance Status

A. General Rules (Chapter 101)

Rule 101.1 - Definitions- In Apparent Compliance (IAC)

This facility does not qualify as a major source for Volatile Organic Compounds (VOC) as defined in Rule 116.112.

Rule 101.2 - Multiple Air Contaminant Sources or Properties- (IAC)

This facility is not affected by this rule. No petitions have been made requesting multiple properties to be designated as a single source.

Rule 101.3 - Circumvention- (IAC)

The facility does not appear to be circumventing any of the rules and regulations of the Commission.

Rule 101.4 - Nuisance- (IAC)

This office has received several complaints against the company concerning dust and odor nuisance; however, a nuisance condition

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Investigator's Comments  
Hercules Marine Services Corp.  
Surfside, Brazoria County  
Investigation No.

BL-0118-V  
12-20-95  
Page 2

concerning dust and odor nuisance; however, a nuisance condition has not been confirmed.

Rule 101.5 - Traffic Hazards- (IAC)

During the visible emissions inspection of this facility, no emissions were observed that might cause a traffic hazard or interfere with normal road use in the area surrounding the facility.

Rules 101.6/101.7 - Upset & Maintenance Reports- (IAC)

The company has not submitted any upsets and maintenance activity reports in the past year.

Rule 101.8 - Sampling- (IAC)

The company has not been required to perform any testing in the past year.

Rule 101.9 - Sampling Ports- (IAC)

The facility appears to have all required sampling ports and power sources that may be necessary to sample emissions from this source.

Rule 101.10 - Emissions Inventory- (IAC)

The company is not required to submit an emissions inventory report.

Rule 101.11 - Exemptions from Rules and Regulations- (IAC)

The facility is aware of the exemptions stated in this rule and that the exemptions do not allow the facility to cause a nuisance during performance of the exempted activities.

Rule 101.12 - Board Seal- Not Applicable (NA)

Not an enforcement related rule.

Rule 101.13 - Use and Effect of Rules- (NA)

Not an enforcement related rule.

Rule 101.14 - Sampling Procedures and Terminology- (IAC)

The company appears to use the required methodology when sampling and measuring air contaminants.

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Hercules Marine Services Corp.  
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Rules 101.15/101.16/101.17 - Petition for Variance/Acceptance of Variance/Transfer of Variance- (NA)

Rule 101.18 - Remedies Cumulative- (NA)

Not an enforcement related rule.

Rule 101.19 - Severability- (NA)

No provisions applicable to this facility have been declared invalid in the past year.

Rule 101.20 - Compliance with EPA Standards- (NA)

40 Code of Federal Regulations, NSPS- (NA)

This facility is not subject to New Source Performance Standards (NSPS).

40 Code of Federal Regulations, NESHAP

The facility is not subject to any Nation Emission Standards for Hazardous Air Pollutants (NESHAP) regulations. The following is a discussion of why the facility is exempt from the Subparts that might possibly apply.

This facility is not subject to fugitive emissions monitoring requirements because this facility is not considered to be part of the synthetic organic chemical manufacturing industry, is not a petroleum refinery and does not operate a polymer, resin, or MTBE manufacturing process, or a natural gas or gasoline processing operation.

Rule 101.21 - National Primary and Secondary Ambient Air Quality Standards- (NA)

The National Primary and Secondary Ambient Air Quality Standards as promulgated pursuant to Section 109 of the Federal Clean Air Act, as amended, will be enforced in Texas.

Rule 101.22 - Effective Date- (NA)

Not an enforcement related rule.

Rule 101.23 - Alternate Emission Reduction- (NA)

The company has not requested an alternate means of emission control within the last year.

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Investigator's Comments  
Hercules Marine Services Corp.  
Surfside, Brazoria County  
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Rule 101.24 - Inspection Fees- (IAC)

General Rule 101.27 states that an account subject to both an emissions fee and an inspection fee is only required to pay the greater of the two fees. See Rule 101.27 below. The company presented an invoice from their files dated November 9, 1994 which showed that the emissions fee in the amount of \$520.00 had been paid as to the TNRCC. See Attachment III.

Rule 101.25 - Fees for Registration of Non-permitted Facilities- (NA)

Texas Clean Air Act Section 382.060 has been repealed and thus this section requiring registration and fees for grand fathered facilities is no longer enforceable.

Rule 101.26 - Surcharge on Fuel Oil in Specified Boilers- (NA)

The facility has a boiler rated at 2.5 MBtu; therefore, the company is not required to pay a surcharge.

Rule 101.27 - Emissions Fees- (IAC)

An emissions fee must be paid to the TNRCC each fiscal year based on allowable and/or actual emissions at the facility during the last full calendar year preceding the beginning of the fiscal year. A facility subject to both an inspection fee and an emission fee must only pay the greater of the two fees.

The company presented a copy of the invoice from their files dated November 9, 1994 showing that the amount of \$520.00 had been paid to the TNRCC. See Attachment III.

Rule 101.28 - Asbestos Notification Fees- (NA)

The company has not had asbestos removal in the past year and therefore did not have to pay notification fees.

Rule 101.29 - Emissions Banking- (NA)

The company is eligible for Emissions Banking because it is located in a designated ozone nonattainment area; however, the company is not participating in emissions banking.

B. Regulation I - (Chapter 111) Visible Emissions and Particulate Matter

Rules 111.101-111.110 - Prohibition of Outdoor Burning- (IAC)

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Hercules Marine Services Corp.  
Surfside, Brazoria County  
Investigation No.

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The company states that outdoor burning is not conducted at this facility. No outdoor burning was observed during this inspection.

Rule 111.111 - Visible Emissions- (IAC)

No visible emissions were observed on stationary vents or other possible sources within the facility.

Rule 111.113 - Alternate Opacity Limitations- (NA)

The facility has not filed an application for approval of an alternate limit for opacity limitations.

Rules 111.121-111.129 - Incinerators- (NA)

The facility does not have an incinerator which burns domestic, municipal, commercial, or industrial solid waste. So this section is not applicable.

Rules 111.131-111.139 - Abrasive Blasting of Water Storage Tanks By Portable Operations- (NA)

The facility has not performed abrasive blasting on any water storage tanks within the last year.

Rules 111.141-111.149 - Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots- (NA)

Rule 111.141 - Applicability- (NA)

This facility is outside of that portion of Harris County inside of the loop formed by Beltway 8 and therefore they are exempt from this section.

Rule 111.143 - Materials Handling- (NA)

Rule 111.145 - Construction and Demolition- (NA)

Rule 111.147 - Roads, Streets, and Alleys- (NA)

Rule 111.149 - Parking Lots- (NA)

Rule 111.151-111.155 - Emission Limits for Non-Agricultural Processes- (NA)

No source may cause, suffer, allow, or permit emissions of particulate matter from any source to exceed the allowable levels specified in Table I (Page 22 of Regulation I).

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Investigation No.

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Rules 111.171-111.175 - Emission Limits on Agricultural Sources-  
(NA)

This facility is not an agricultural source; therefore, this section does not apply.

Rules 111.181-111.183 - Exemptions for Portable or Transient Operations- (NA)

This facility is not a portable or transient operation; therefore, this section does not apply.

C. Regulation II - (Chapter 112) Control of Air Pollution from Sulfur Compounds

Rules 112.1-112.21 - Control of Sulfur Dioxide- (NA)

This facility does not emit Sulfur Dioxide to the atmosphere and therefore is not subject to this section of rules.

Rules 112.31 - Control of Hydrogen Sulfide- (NA)

No person may cause, suffer, allow, or permit emissions of hydrogen sulfide from a source or sources operated on a property or multiple sources operated on contiguous properties to exceed a net ground level concentration of 0.08 parts per million averaged over any 30-minute period if the downwind concentration of hydrogen sulfide affects a property used for residential, business, or commercial purposes.

There are no sulfur emissions from this facility; therefore, this facility is not subject to this section of rules.

Rules 112.41-112.47 - Control of Sulfuric Acid- (NA)

This facility does not emit sulfuric acid from the process and therefore stays below the allowable limit of 15 micrograms per cubic meter of air over any 24 hour period.

Rules 112.51-112.59 - Control of Total Reduced Sulfur- (NA)

The facility is not a kraft pulp mill; therefore, this rule does not apply.

D. Regulation III - (Chapter 113) Toxic Materials

The facility does not handle inorganic fluoride compounds, beryllium, or lead from ferrous smelters, and is therefore, not required to comply with this regulation.

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E. Regulation IV - (Chapter 114) Control of Air Pollution from Motor Vehicles

Rules 114.1-114.5 - Maintenance and Operation of Air Pollution Control Systems on Motor Vehicles- (NA)

The company did not have a vehicle available for inspection.

Rule 114.11 - Alternative Fuel Requirements for Transit Authorities- (NA)

The facility is not a metropolitan rapid transit authority and is therefore not required to comply with this rule.

Rule 114.13 - Oxygenated Fuels- (NA)

The facility does not supply, sell, or dispense oxygenated gasoline to El Paso and is not affected by this rule.

Rule 114.21 - Employer Trip Reduction Program- (NA)

D. Regulation V - (Chapter 115)- Control of Air Pollution from Volatile Organic Compounds- (IAC)

Rule 115.010 - Definitions- Not an enforcement related rule

Rules 115.112-115.119 - Storage of Volatile Organic Compounds- (IAC)

Rule 115.112 (a)(1)- (IAC)

No person in the Houston/Galveston area is allowed to place, store, or hold in any stationary tank, reservoir, or other container, any Volatile Organic Compound (VOC) unless the container is capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere, or is equipped with at least the control device specified in Table I(a) for VOC other than crude oil and condensate or Table II(a) for crude oil and condensate.

There are thirteen fixed roof storage tanks with submerged fill pipes located on the property which meet the requirements of this section. See Attachment IV.

Rule 115.112(a)(2)(A-F) - Floating Roof Storage Tanks- (NA)

The storage tanks are all fixed roof and therefore, the requirements of this section are not applicable.

Rule 115.112(a)(3) - Tanks with Vapor Recovery Systems- (NA)

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Investigator's Comments  
Hercules Marine Services Corp.  
Surfside, Brazoria County  
Investigation No.

BL-0118-V  
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This facility does not have any floating roof tanks with a vapor recovery system; therefore, this rule is not applicable.

Rule 115.113 - Alternate Control Requirements- (NA)

Facilities in the Houston/Galveston area alternate methods of demonstrating and documenting continuous compliance with the applicable control requirements or exemption criteria in this section may be approved by the Executive Director if emissions reductions are demonstrated to be substantially equivalent.

This facility has not requested an alternate method to the control requirements of the exemption criteria for which they qualify.

Rule 115.114-115.116 - Testing/Monitoring/Record keeping Requirements- (NA)

Facilities located in the Houston/Galveston area must inspect secondary seals on a semiannual basis. Compliance with 115.112(a)(2)(F) may be determined by visual inspection for tanks with metallic-type shoe or liquid mounted primary seals.

This facility is exempt from these requirements because the storage tanks are fixed roof and not floating roof tanks.

Rule 115.117 - Exemptions- (NA)

Rule 115.119 - Counties and Compliance Schedules- (NA)

In Harris County, all persons affected by Rules 115.116 (a)(2) shall be in compliance with the calculation and emission reporting requirements for secondary seal gaps exceeding 1/8 inch beginning with calendar year starting on January 1, 1996.

This facility does not have secondary seal gaps on their storage tanks and therefore does not have to do the calculations.

Rules 115.121-115.129 - Vent Gas Control of VOC's- (NA)

There are no vent gas control devices located at this facility.

Rules 115.131 - 115.139 - Water Separators Containing VOC's- (NA)

This facility does not have a water separator.

Rules 115.140-15.149 - Industrial Wastewater- (NA)

This facility does not meet the definition of the affected source category.

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Hercules Marine Services Corp.  
Surfside, Brazoria County  
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Rules 115.152-115.159 - Municipal Solid Waste Landfills- (NA)

This facility does not contain a municipal solid waste landfill.

Rules 115.211-115.219 - Loading and Unloading of VOC's- (NA)

This facility does not load or unload VOC and therefore the requirements of this section are not applicable.

Rules 115.221-115.229 - Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities- (NA)

This facility is not a motor vehicle dispensing facility.

Rules 115.234-115.239 - Control of VOC Leaks from Transport Vehicles- (NA)

This rule does not apply to this facility.

Rules 115.241-115.249 - Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities- (NA)

This facility is not a motor vehicle dispensing facility.

Rules 115.311-115.359 - Petroleum Refining and Petrochemical Processes- (NA)

This facility is not a petroleum refinery nor does it manufacture petrochemicals.

Rules 115.412-115.419 - Degreasing Processes- (NA)

The facility does not have a degreaser on site.

Rules 115.421-115.429 - Surface Coating Processes- (NA)

Coating operations of fully assembled marine vessels are exempt from this regulation.

Rules 115.432-115.439 - Graphic Arts by Rotogravure and Flexographic Processes- (NA)

This facility does not perform graphic arts.

Rules 115.442-115.449 - Offset Lithographic Printing- (NA)

This facility does not perform offset lithographic printing.

Rules 115.512-115.519 - Cutback Asphalt- (NA)

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This facility does not produce cutback asphalt.

Rules 115.521-115.529 - Perchloroethylene Dry Cleaning Systems-  
(NA)

This facility does not perform dry cleaning.

Rules 115.531-115.539 - Pharmaceutical Manufacturing Facilities-  
(NA)

This facility does not manufacture pharmaceuticals.

Rules 115.541-115.549 - Degassing or Cleaning of Stationary and Transport Vehicles- (NA)

The facility does not have to comply with this set of rules until after November 26, 1996.

Rules 115.552-115.559 - Petroleum Dry Cleaning Systems- (NA)

This facility does not operate a dry cleaning system.

Rules 115.612-115.619 - Consumer-Solvent Products- (NA)

This facility does not sell automobile windshield wiper fluid which contains VOC's as an active ingredient, solvent, or any other component in a concentration greater than 8.0% by weight.

Rules 115.621-115.625 - Utility Engines- (NA)

This section concerning utility engines or equipment powered by a utility engine is not applicable until January 1, 1996.

Rule 115.910 - Alternate Means of Control- (NA)

Any person affected by any control requirement of this chapter may request the Executive Director to approve alternate methods of control. The Executive Director shall approve such alternate methods if it can be demonstrated that the control will result in substantially equivalent emission reductions as the methods specified in this regulation. Approval by the EPA is not required.

The facility has not requested an alternate means of control plan.

Rules 115.920-115.940 - Compliance and Control Plan Requirements-  
(NA)

These are administrative provisions and not enforceable requirements for the facility.

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Rule 115.950 - Standard Permits- (NA)

The facility has not installed VOC abatement equipment.

E. Regulation VI (Chapter 116) - Air Pollution Permits for New Construction or Modification

Rules 116.010-116.012 - Definitions

Not an enforceable rule.

Rule 116.110-114 - Applicability- (IAC)

The company has applied for and received a permit exemption for their barge cleaning facility on June 8, 1982.

Rule 116.111 - General Application- (NA)

Facility submitted a PI-1 General Application for construction of a flame oxidizer on January 11, 1994; however, the application was administratively voided January 21, 1994.

Rule 116.114 - Application Review Schedule- (NA)

No new applications have been submitted to the TNRCC.

Rule 116.115 - Special Provisions-

TNRCC Permits, special permits, and exemptions may contain general and special provisions. The holders of permits, special permits, and exemptions must comply with any and all such provisions.

The facility is complying with the requirements of Standard Exemption (SE) 7 for boilers.

Rule 116.117 - Distance Limitations- (NA)

The facility does not have nor do they plan to have a lead smelter or a hazardous waste management facility.

Rules 116.120-116.126 - Compliance History- (NA)

No new permit applications have been received so a compliance history of the facility was not required.

Rules 116.130 - 116.137 - Public Notification and Comment Procedures- (NA)

No new permit applications have been received so public notice and

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comment procedures have not been necessary.

Rules 116.140-116.143 - Permit Fees- (NA)

No new permits have been applied for so no permit fees are necessary.

Rules 116.150-116.151 - Nonattainment Review- (NA)

No new major source or major modification applications were received in 1994 for this facility, so these rules are not applicable.

Rules 116.160-116.162 - Prevention of Significant Deterioration Review- (NA)

This facility is not a new major source or has proposed a major modification.

Rules 116.170-116.175 - Emission Reductions: Offsets- (NA)

At the time of application for a permit, any applicant who has effected air contaminant emission reductions may also apply to the Executive Director to use such emission reductions to offset emissions expected from the facility for which the permit is sought.

No new permit applications or emission reduction offsets have been received for this facility.

Rules 116.211-116.213 - Permit Exemptions- (IAC)

Rule 116.211 - Standard Exemption List- (IAC)

Facilities listed in the Standard Exemption List which meet all the conditions of the exemption and have meet the total emission criteria for their geographic area are exempt from the permit requirements of the Texas Clean Air Act Rule 382.0518 because such facilities will not make a significant contribution of air contaminants to the atmosphere.

The facility has a Permit Exemption No. X-3561 covering Heater H-1(boiler). This boiler has been replaced with a boiler that utilizes propane gas. The boiler meets the requirements of SE 7. It has been suggested to the company that they write a letter to New Source Permits Review Section and have the permit exemption voided.

Rules 116.310-116.314 - Permit Renewals- (NA)

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The facility does not have any permits up for renewal at this time.

Rules 116.410-116.418 - Emergency Orders- (NA)

The owner or operator of a facility may apply for an emergency order authorizing immediate action for the addition, replacement, or repair of facilities or control equipment, and authorized associated emissions of air contaminants, whenever a catastrophic event necessitates such construction and emissions otherwise precluded under the Texas Clean Air Act.

The facility has not applied for any emergency orders.

H. Regulation VII - (Chapter 117) NITROGEN COMPOUNDS

Rule 117.010 - Definitions- (NA)

Non-enforcement related rule.

Rules 117.101-117.121 - Utility Electric Generation- (NA)

There are no utility electric generators located at this facility.

Rules 117.201-117.221 - Commercial, Institutional, and Industrial Sources- (NA)

The facility has a boiler rated at 2.5 million Btu and therefore, it is exempt from the requirements of this title.

Rules 117.301-117.321 - Adipic Acid Manufacturing- (NA)

This facility does not manufacture adipic acid and is therefore not subject to this section of rules.

Rules 117.401-117.458 - Nitric Acid Manufacturing- (NA)

This facility does not manufacture nitric acid and is therefore not subject to this section of rules.

Rules 117.510-117.570 - Administrative Provisions- (IAC)

This facility is exempt from the requirements relating to commercial, institutional, and industrial sources and does not have to submit a compliance plan.

Rule 117.601 - Gas Fired Steam Generators- (NA)

This facility does not operate a gas fired steam generator and is not subject to this section of rules.

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I. Regulation VIII - (Chapter 118) CONTROL OF AIR POLLUTION EPISODES

Rule 118.1-118.6 - EMISSION REDUCTION PLAN- (NA)

The facility is not located in Harris County; therefore, the facility is not required to prepare and maintain an emission reduction plan.

J. Regulation IX - (Chapter 119) CARBON MONOXIDE

This facility is exempt from this regulation as it does not contain any of the regulated processes (a catalyst regeneration system, an iron cupola, or a blast furnace).

K. Regulation X - (Chapter 120) HAZARDOUS/SOLID WASTE FACILITIES

This facility does not generated hazardous waster and therefore, is exempt from the requirements of this regulation.

L. Regulation XI - (Chapter 121) MUNICIPAL SOLID WASTE FACILITIES

This facility is exempt from this regulation because it is not a municipal solid waste facility.

M. Regulation XII - (Chapter 122) Federal Operating Permits

The owner or operator of one or more of the following sites must submit an application to the TNRCC for a federal operating permit.

- 1) Major source
- 2) Acid Rain source
- 3) Solid Waste Incineration Unit
- 4) Non-major source subject to NSPS, Hazardous Air Pollutants, NESHAP.

The facility will not have to apply for a federal operating permit.

IV. Federal Regulation Review and Compliance Status

The facility is not subject to any Nation Emission Standards for Hazardous Air Pollutants (NESHAP) nor New Source Performance Standards (NSPS) regulations.

V. Board and/or Court Orders

The company had not been issued an agreed order or court order in the last year.

VI. Permit Review

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See Section H for discussion of permit review.

VII. Control Equipment Operating Parameters

The facility plans to install a thermal oxidizer to control VOC emissions from the degassing and cleaning of barges to comply with Regulation V by November 26, 1996.

VIII. Sampling and Monitoring

The facility has not been required to do any sampling or monitoring of air pollutants in the past year.

IX. Upset/Maintenance Reports

This office has not received upset/maintenance reports from the facility since the last SIP inspection.

X. Production

This facility is not producing a commodity and therefore, does not have production rates.

XI. Emission Estimates

The emissions emitted from this facility are not expected to exceed 10 tons per year (tpy) VOC, 25 tpy NOx, or 100 tpy CO.

XII. Toxics

This facility is not subject to SARA Title III reporting requirements.

XIII. Compliance/Enforcement Status

The company was issued a Notice of Violation on September 3, 1992 for violations noted during a complaint investigation. An FEC was held on October 1, 1992 to discuss the violations. The company has corrected the violations. There is no pending enforcement action or agreed orders.

XIV. Source Management Checklist

See Attachment V.

XV. Map of Facility Location.

See Attachment VI.

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*Candace C. Bartlett*

Candace C. Bartlett  
E.Q.S. IV  
Region 12- Air Program

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ATTACHMENT 1  
PROCESS DESCRIPTION

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ATTACHMENT 2  
PROCESS PROCEDURE

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## BARGE STRIPPING PROCEDURES ONLY

The PERSON IN CHARGE is responsible for directing the product of whatever barge has docked for the purpose of stripping product. When stripping operations begin, the PERSON IN CHARGE conducts operations as described in the following manner:

When transfer operations are to occur, PERSON IN CHARGE initially assures that the barge to be stripped is secure to our dock. The ground cables are connected, a D.O.I. sheet is filled out. PERSON IN CHARGE must make the decision to either strip overhead through the cargo header using 12 ft long - 2" aluminum pipe with a brass kamlock connector or hook into barge stripping system usually by kamlock connectors. All stripping procedures are done by suction with vacuum pump. Hoses are connected to our vacuum pump with kamlock connectors.

All stripping is done in a safe and responsible manner. If weather conditions worsen, all stripping is stopped and will not proceed until conditions improve. After stripping is completed all hoses are capped off and cleaned and stored on dock.

Once stripping completed, barge is secured to our dock with a minimum of three -2" lines.

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*Strength through environmental awareness and customer service*

P.O. Drawer O  
Freeport, Texas 77541

Office (409) 233-6371  
Fax: (409) 233-6375

## BARGE CLEANING PROCEDURE

### (COLD WATER WASH)

- Secure the barge to be cleaned at the gas free dock and set gangway.
- Obtain work order and the name of the last product the barge contained.
- Hold safety meeting and go over the chemical data sheet and cleaning procedure to be used.
- Inspect the barge for the location of cargo piping, deepwell, pump, check valve, stripping poles etc. and determine if ballasting is required. (Tilt cargo tanks for cleaning).
- Open cargo tanks and check for product using approved respirators.
- Using the approved respirator, set up venture air mover down wind over the butterworth hatch opening to pull the product fumes back in to the cargo tank and away from the hatch opening to be used to strip product through. Set up stripping pump and/or vacuum and remove all free product from the cargo tanks and transfer it to yard storage tanks for disposal.
- The product is removed from the cargo piping and associated equipment by draining it into the cargo tanks and using the stripping pipes built into the piping system to pump it or vacuum it out. Additional product is removed by using air pressure to blow down and into the cargo tanks.
- Using the barge deck header a high pressure water hose is attached to the manifold and the piping system is washed down and into the barge tanks. After washing is complete air pressure is used to blow all the free water from the system down and into the cargo tanks.
- Using approved respirators, add additional air movers and ventilate until tests show the tanks are gas free for entry with respirators to hand hose (hand held fire nozzle) wash the interior of the cargo tanks. A confined space entry permit must be filled out and approved by the entry supervisor. The wash water is pumped to shore storage tanks for disposal using portable air pump and/or vacuum.
- If the job dictates, the cargo tanks are dried using the venture air movers.
- Replace the check valve gasket with new gasket then tighten bolt evenly around flange.
- Air test cargo line to 40 psi using soap.
- Fill out final check list before releasing barge.
- All testing is done using the MSA EXPLOSIMETER-OXYGEN METER, DRAGER TUBES AND GAS TECK DETECTOR SYSTEMS.
- A marine chemist is called to certify the barges safe for hotwork and entry of mechanical workers after cleaning and gas freeing is complete.

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ATTACHMENT 3  
INSPECTION FEE INVOICE

000855

# Texas Natural Resource Conservation Commission

Office of Air Quality  
Technical Services  
(512) 239-1532

EMISSIONS/INSPECTION FEE FORM  
Fiscal Year 1996  
(9/1/95 - 8/31/96)

ARN: \_\_\_\_\_ DATE: \_\_\_\_\_  
AMT: \_\_\_\_\_ CHK. NO. \_\_\_\_\_

AGENCY USE ONLY

## Company Account Information

**\*\* PLEASE NOTIFY TNRCC IMMEDIATELY IF THIS ACCOUNT HAS BEEN SOLD.**

Company Contact:

HERCULES OFFSHORE FACILITY  
906 MARLIN  
FREEPORT, TX 77541

Larry Ballinger  
(Please Print Name)

(409) 233-0771  
(Phone)

Account No.: BL0118V  
Site Name: BARGE CLEANING FACILITY  
County: BRAZORIA  
SIC Code: 4491 Fee Due By: 11/15/95

Federal ID No. 76-0415601

Texas Charter No. \_\_\_\_\_

Facility Sold? \*\*Yes \_\_\_\_\_ No X  
\*\* Attach New Name, Address, &  
Telephone Number

(PLEASE INDICATE ANY CHANGES ABOVE)

List below the Current Permit Allowables and/or  
Actual Emissions to be based on Calendar Year 1994.

Regulated Pollutants (Only add others that cannot be categorized as one of these)	(1) Sum of Permitted Allowables used (tons per year) (See Instructions)	(2) Sum of Actual Emissions Used (tpy) from Calendar Year 1994 (See Instructions)	Sum of columns (1 & 2) to yield total for each pollutant. (Not To Exceed 4,000 Tons Per Regulated Pollutant.)
VOLATILE ORGANIC COMPOUNDS	3	N/A	3
NITROGEN OXIDES	2	N/A	2
TOTAL SUSPENDED PARTICULATE	1	N/A	1
SULFUR DIOXIDE	13	N/A	13
CARBON MONOXIDE	1	N/A	1

(PLEASE ATTACH ADDITIONAL PAGES AS NEEDED)

Total (TPY)  
(Rounded Up)

20

(A) Inspection Fee: (Amount from SIC Fee Table, IF APPLICABLE). . . \$ -0-  
(B) Emissions Fee: Total T/Y X \$26.00 (\$26 minimum, IF APPLICABLE). \$ 520.00  
(C) Pay the GREATER (A or B) and enter here: . . . \$ 520.00

Comments/Additional Information:

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RETURN COMPLETED FORM & REMITTANCE TO:  
(SEE ADDRESSES ON BACK OF FORM)

FEE-96  
(7-25-95)

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ATTACHMENT 4  
STORAGE TANK INFORMATION

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*Spill Prevention Control and Countermeasure Plan*

<b>TABLE 1 HERCULES OFFSHORE CORPORATION STORAGE TANK INVENTORY FREEPORT, TEXAS</b>		
<b>TANK NO.</b>	<b>CAPACITY (gallons)</b>	<b>CONTENTS</b>
1	73,500	Wash Water
2	73,500	Wash Water
9	28,000	Wash Water
10	3,400	Xylene/Cyclohexane
11	10,000	Caustic Wash Water
12	3,000	Propylene Glycol
13	6,000	Slop Oil
14	6,000	Caustic Wash Water
15	500	Empty
16	5,000	Caustic Wash Water
17	4,000	Ethylene Dichloride
18	3,000	Raffinate
19	3,000	Chloroform
20	4,500	Chloroform
21	20,000	Caustic Wash Water
24	300	Empty
V-303	3,400	Chemical Transfer Truck
V-404	6,000	Chemical Transfer Truck
<del>T-2</del>	<del>7,600</del>	<del>Vacuum Settling Tank</del>
T-3	28,800	Barge Cleaning Sludge
No Number	2,000	Diesel Fuel
<del>No Number</del>	<del>5,000</del>	<del>Fiberglass-out of service</del>

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ATTACMENT 5

SOURCE MANAGEMENT INFORMATION SHEET

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## Section I Source Management Information

Account No. \_\_\_\_\_ County BRAZORIA Date 12/20/95  
Company Hercules Marine Services Corporation  
Facility Hercules Marine Yard  
Street/Location 906 Marlin St.  
Mailing Address P. O. Drawer 0  
City Freeport State Texas Zip 77541  
Parent Corporation HERCULES OFFSHORE CORPORATION  
Corporation Address 11011 RICHMOND, SUITE 500  
City Houston State Texas Zip 77042  
Corporate CEO Tom Hord Title Vice President  
Plant Manager Larry Ballinger Title Co-Manager  
Environmental Contact Jimmy Jackson Title Co-Manager  
Telephone Number Plant: (409) 233-6371 Headquarters: (713) 789-7983  
Principal Business Barge Cleaning and Repair

000860

# Material Safety Data Sheet

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BASF CORPORATION  
3000 CONTINENTAL DRIVE  
MT. OLIVE, NJ 07828  
(201) 426-4671

Original Date: 10/02/1992  
Revision Date: 09/15/1995

Emergency Telephone: (800) 424-9300 (CHEMTREC)  
(800) 832-HELP (BASF Hotline)  
BOTH NUMBERS ARE AVAILABLE DAYS, NIGHTS, WEEKENDS, & HOLIDAYS.

## SECTION 1 - PRODUCT INFORMATION

ANOLON®  
Product ID: NCO 526172  
Common Chemical Name:  
N/A  
Synonyms:  
Cyclohexanone/Cyclohexanol Mixture  
Molecular Formula:  
MIXTURE  
Molecular Wt.: NOT APPLICABLE  
Chemical Family: Cyclic Ketone and Alcohol

## SECTION 2 - INGREDIENTS

Chemical Name:	CAS	Amount
Cyclohexanol	108-93-0	- 60.0 %
ACGIH TLV	TWA 50 PPM	
OSHA PEL	TWA 50 PPM	
Cyclohexanone	108-94-1	- 40.0 %
ACGIH TLV	SKIN TWA 25 PPM	
OSHA PEL	TWA 50 PPM	

## SECTION 3 - PHYSICAL PROPERTIES

Color: Pale Yellow  
Form/Appearance: Liquid  
Odor: Camphor

Specific Gravity: Typical 0.941 Low/High U.O.M.  
pH: NOT AVAILABLE

Boiling Pt: Typical Low/High 75 - 165 Deg. @ Pressure  
Freezing Pt: NOT AVAILABLE C 760 MM HG  
Decomp. Tmp: NOT AVAILABLE

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Solubility: Typical Low/High 3.6 - 9 U.O.M. @ Temperature  
G/100 G WA 20 C

2.9 milbars @ 20°C

#### SECTION 4 - FIRE AND EXPLOSION DATA

	Typical	Low/High	Deg.	Method
Flash Point:	50.6			C TAG CLOSED CUP
Autoignition:	300			C NOT SPECIFIED
Flam. Limits:		1.1 - 8.1	%	

##### Extinguishing Media:

Water fog, alcohol foam, CO<sub>2</sub> or dry chemical extinguishing media.

##### Fire Fighting Procedures:

Firefighters should be equipped with self-contained breathing apparatus and turn out gear. Water may be ineffective but should be used to keep exposed containers cool.

##### Unusual Hazards:

Vapors from heated (above flashpoint) of product may travel to a source of ignition and flash back.

#### SECTION 5 - HEALTH EFFECTS

Routes of entry for solids and liquids include eye and skin contact, ingestion and inhalation. Routes of entry for gases include inhalation and eye contact. Skin contact may be a route of entry for liquified gases.

##### Acute Overexposure Effects:

Contact with the eyes may result in moderate to severe irritation and corneal injury. Contact with the skin results in moderate irritation; prolonged or repeated contact may cause dermatitis. Material may also be skin absorbed.

Inhalation of cyclohexanone vapors may cause narcosis, headache, drowsiness, tremors and other CNS effects. Cyclohexanone vapors may cause mild irritation to the eyes. Cyclohexanone can be skin absorbed.

##### Chronic Overexposure Effects:

Based on animal studies, overexposure to cyclohexanol by ingestion, inhalation or absorption can cause CNS depression, lacrimation, nausea, tremors or convulsions. Repeated overexposures in animals also caused tissue damage to the liver, kidney and heart.

Guinea pigs exposed to 4000 ppm of cyclohexanone for a 6-hour period showed signs of CNS depression, lacrimation, salivation, depression of body temperature and respiratory heart rate, and opacity of the cornea. Mice, guinea pigs, and cats exposed to 3800 ppm exhibited the same effects. Based on animal studies, overexposure could lead to liver and/or kidney damage.

##### First Aid Procedures - Skin:

Wash affected areas with soap and water. Remove and launder contaminated clothing before reuse. Get immediate medical attention.

##### First Aid Procedures - Eyes:

Immediately rinse eyes with running water for 15 minutes. Get immediate medical attention.

##### First Aid Procedures - Ingestion:

If swallowed, dilute with water and immediately induce vomiting. Never give fluids or induce vomiting if the victim is unconscious or having convulsions. Get immediate medical attention.

#### SECTION 5 - HEALTH EFFECTS (cont)

---

**First Aid Procedures - Inhalation:**

Move to fresh air. Aid in breathing, if necessary, and get immediate medical attention.

**First Aid Procedures - Notes to Physicians:**

None known.

**First Aid Procedures - Aggravated Medical Conditions:**

No data is available which addresses medical conditions that are generally recognized as being aggravated by exposure to this product. Please refer to Section 5 (Effects of Overexposure) for effects observed in animals.

**First Aid Procedures - Special Precautions:**

None

#### SECTION 6 - REACTIVITY DATA

---

**Stability Data:**

Stable

**Incompatibility:**

Oxidizing/reducing agents, plastics, resins, rubber.

**Conditions/Hazards to Avoid:**

Avoid excessive heat and ignition sources.

**Hazardous Decomposition/Polymerization:**

Hazardous polymerization does not occur. Material is stable under normal conditions. Decomposition products are CO and CO<sub>2</sub>.

**Corrosive Properties:**

Not corrosive.

**Oxidizer Properties:**

Not an oxidizer

**Other Reactivity Data:**

None known.

#### SECTION 7 - PERSONAL PROTECTION

---

**Clothing:**

Gloves, coveralls, apron, and boots as necessary to prevent contact.

**Eyes:**

Chemical goggles; also wear a face shield if splashing hazard exists.

**Respiration:**

If vapors or mists are generated, wear a NIOSH/MSHA approved organic vapor/mist respirator. Use an air-supplied or self-contained breathing apparatus in emergency or non-routine, high exposure situations.

**Ventilation:**

Use local exhaust to control to recommended P.E.L.

**Explosion Proofing:**

Tools should be non-sparking. Exhaust fans should be explosion proof.

**Other Personal Protection Data:**

Eyewash fountains and safety showers must be easily accessible.

#### SECTION 8 - SPILL-LEAK/ENVIRONMENTAL

---

**General:**

Spills should be contained, solidified and placed in suitable 000863

### SECTION 8 - SPILL-LEAK/ENVIRONMENTAL (cont)

containers for disposal in a RCRA licensed facility. This material is RCRA hazardous due to its properties.

**Waste Disposal:**

Incinerate at a RCRA licensed facility. Do not discharge into waterways or sewer systems without proper authority.

**Container Disposal:**

Empty containers with less than 1 inch of residue may be landfilled at a licensed facility. Recommend crushing or other means to prevent unauthorized reuse. Other containers must be disposed of in a RCRA licensed facility.

### SECTION 9 - STORAGE AND HANDLING

**General:**

Avoid excessive heat or sources of ignition. Store in clean, cool, well-ventilated no-smoking area in sealed and grounded containers.

### SECTION 10 - REGULATORY INFORMATION

**TSCA Inventory Status**

Listed on Inventory: YES

RCRA Haz. Waste No.: D001

CERCLA: YES Reportable Qty.: (If YES) 5000 LBS

The RCRA hazardous waste number D001 refers to this material's RCRA hazardous waste characteristic of ignitibility.

**Hazard Ratings:**

	Health:	Fire:	Reactivity:	Special:
HMIS	2	2	0	NA

This product is hazardous or contains components which are hazardous according to the OSHA Hazard Communication Standard.

### SECTION 11 - TRANSPORTATION INFORMATION

**DOT Proper Shipping Name:**

REFER TO BASF BILL OF LADING

**DOT Technical Name:**

REFER TO BASF BILL OF LADING

**DOT Primary Hazard Class:**

REFER TO BASF BILL OF LADING

**DOT Secondary Hazard Class:**

REFER TO BASF BILL OF LADING

**DOT Label Required:**

REFER TO BASF BILL OF LADING

**DOT Placard Required:**

REFER TO BASF BILL OF LADING

**DOT Poison Constituent:**

REFER TO BASF BILL OF LADING

BASF Commodity Codes: NA NA UN/NA Code: 1993 E/R Guide: 000864

**Bill of Lading Description:**

FOR THE MOST UP-TO-DATE D.O.T. SHIPPING DESCRIPTION, PLEASE REFER TO

ANOLON®  
NCO 526172

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**SECTION 11 - TRANSPORTATION INFORMATION (cont)**

---

THE BASF BILL OF LADING!

ANOLON  
is a registered trademark of BASF Corporation or BASF AG.

WHILE BASF CORPORATION BELIEVES THE DATA SET FORTH HEREIN ARE ACCURATE AS THE DATE HEREOF, BASF CORPORATION MAKES NO WARRANTY WITH RESPECT THERETO AND EXPRESSINGLY DISCLAIMS ALL LIABILITY FOR RELIANCE THEREON. SUCH DATA ARE OFFERED SOLELY FOR CONSIDERATION, INVESTIGATION, AND VERIFICATION.

END OF DATA SHEET

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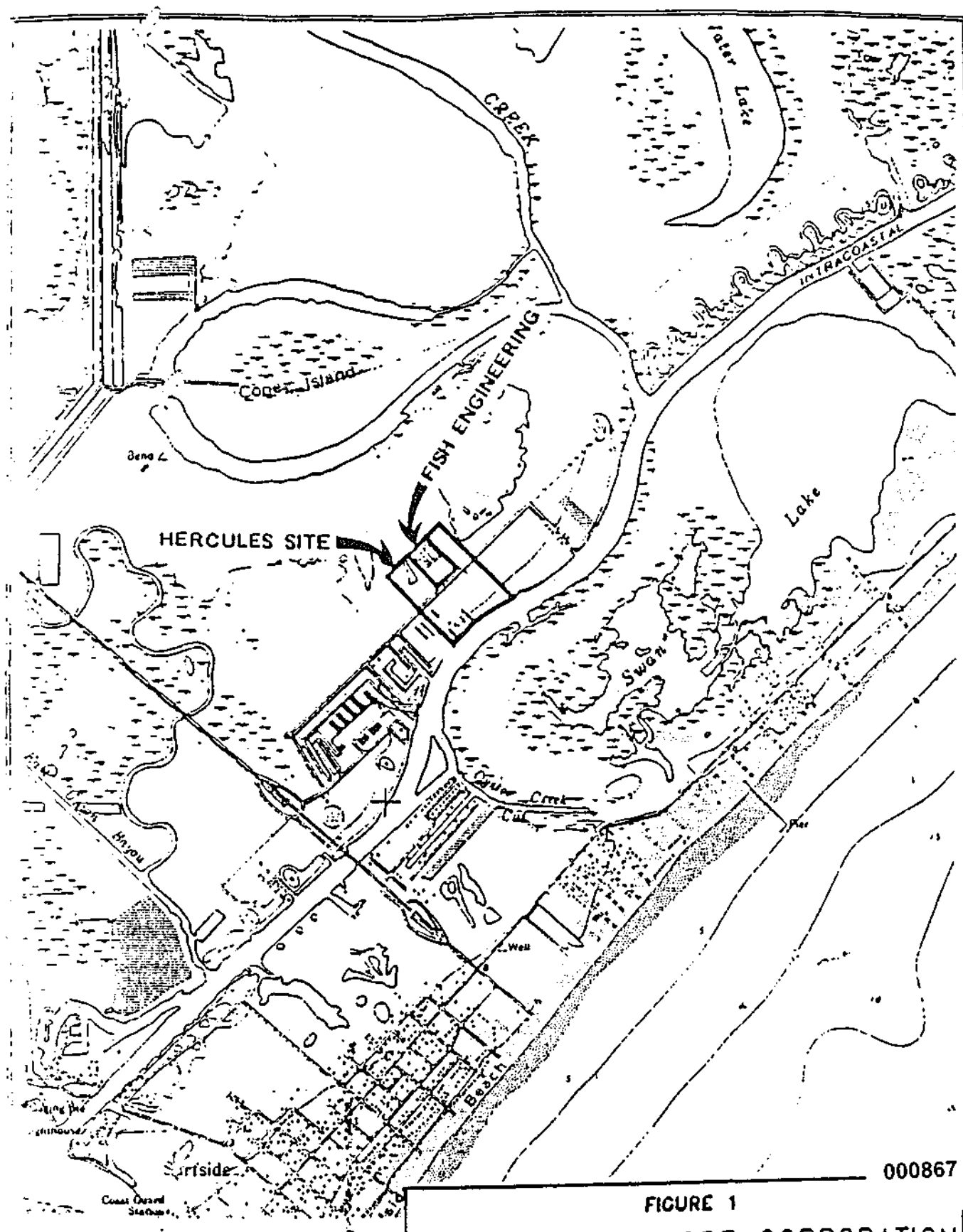
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*N*  
ATTACMENT 6

MAP OF FACILITY LOCATION

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FIGURE 1  
HERCULES OFFSHORE CORPORATION  
FREEPORT, TEXAS  
ARFA MAP



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#### ATTACHMENTS

- Attachment 1: Process Description
- Attachment 2: Process Procedures
- Attachment 3: Inspection Fee Invoice
- Attachment 4: Storage Tank Information
- Attachment 5: Source Management Information Sheet
- Attachment 6: Map of Facility Location

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## Attachment II.

MPCA 1-85 (OSHA 174)

MATERIAL SAFETY DATA SHEET  
FOR COATINGS, RESINS AND RELATED MATERIALS

Ameron Protective Coatings 55849  
201 North Berry Street  
Brea, CA 92622-1020  
NSN: 8010-01-302-3605  
GS#: GS-10F-52192

Information: (714) 529-1951 (H. Kline)  
Emergency: (800) 424-9300 (CHEMTREC)  
Preparation Date: 11-08-91  
Supersedes: 10-29-91

## SECTION 1 -- PRODUCT IDENTIFICATION

TRADE NAME: MIL-P-24441/5C F-154 DARK GRAY RO-3.6 COMP B  
PRODUCT CLASS: EPOXY COATING  
PRODUCT NO: 3364300

FOR INDUSTRIAL USE ONLY  
HEALTH: WARNING

## SECTION 2 -- HAZARDOUS INGREDIENTS

INGREDIENTS	CAS NO.	% BY WT	EXPOSURE LIMITS				VP mm @ 68 F	TOXICITY	
			OSHA PEL ppm	mg/m <sup>3</sup>	ACGIH TLV (TWA) ppm	mg/m <sup>3</sup>		LD50 g/kg	LC50 ppm
EPOXY RESIN	25068-38-6	<55	dna	dna	dna	dna	dna	11.4	dna
MAGNESIUM SILICATE	14807-96-6	<30	dna	2	dna	2	na	na	na
HIGH FLASH NAPHTHA	64742-95-6	19.42	100	dna	100	dna	2.7	0.5	dna
POLYAMIDE	dna	<5	dna	dna	dna	dna	na	5	19.9
XYLENE (SARA)	1330-20-7	1.02	100	435	100	435	6.6	4.3	6700

(STEL 150ppm, Benzene\*\* @ 0-900ppm)

\*\* CALIF. TITLE 26: 22-12000 (PROP 65)

Contains toxic chemical subject to reporting requirements of SARA and CERCLA (40CFR 302,355,372)

## SECTION 3 -- PHYSICAL DATA

BOILING RANGE: 282-313 Deg. F VAPOR DENSITY: Heavier than air CORROSION RATE: na  
VOLATILE VOLUME %: 30 EVAPORATION RATE: Butyl acetate = 1 AUTOIGNITION: 450  
WT PER GAL: 10.5 LBS LOW: 0.37 HIGH: 0.80 DECOMPOSITION TEMP: na  
APPEARANCE: Liquid OOR: Solvent pH: na  
SOLUBILITY IN WATER: na VOC, mixed: 335 g/l, 2.8 lbs/gal VISCOSITY: > 64 KU

## SECTION 4 -- FIRE AND EXPLOSION DATA

FLAMMABILITY: OSHA: Combustible: II FLASH POINT: 115 F (SETA) LFS: 1330-20-7  
DOT: Flammable: 21991 49CFR LEL: 0.50 UEL: 7.00  
Paint UN1263  
EXTINGUISHING MEDIA: Foam, CO<sub>2</sub>, dry chemical. US Postal - nonshippable

UNUSUAL FIRE AND EXPLOSION HAZARDS: Wear self-contained breathing apparatus. Closed containers may explode when exposed to extreme heat. Isolate from heat, electrical equipment, sparks and open flame.

FIREFIGHTING PROCEDURES: Wear full protective equipment, self-contained breathing apparatus.

(C)=Ceiling; (S)=Skin; LD50=Oral, rat; LC50=Inhalation, rat; LFS=Lowest Flashing Solvent  
dna=data not available; na=not applicable; b=ppb

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NPCA 1-85 (OSHA 174)

**MATERIAL SAFETY DATA SHEET**  
FOR COATINGS, RESINS AND RELATED MATERIALS

Ameron Protective Coatings 55849  
201 North Berry Street  
Brea, CA 92622-1020  
NSN: 8010-01-302-3605  
GS#: GS-10 52192

Information: (714) 529-1951 (H. Kline)  
Emergency: (800) 424-9300 (CHEMTREC)  
Preparation Date: 11-08-91  
Supersedes: 10-29-91

SECTION 1 -- PRODUCT IDENTIFICATION

TRADE NAME: MIL-P-24441/SC F-154 DARK GRAY RO=3.6 COMP A  
PRODUCT CLASS: EPOXY COATING  
PRODUCT NO: 3364200

FOR INDUSTRIAL USE ONLY  
HEALTH: WARNING

SECTION 2 -- HAZARDOUS INGREDIENTS

INGREDIENTS	CAS NO.	X BY WT	EXPOSURE LIMITS				VP mm @ 68 F	TOXICITY	
			OSHA PEL ppm	ACGIH TLV (TWA) ppm	mg/m3	mg/m3		LD50 g/kg	LCSO ppm
MAGNESIUM SILICATE	14807-96-6	<40	dna	2	dna	2	na	na	na
BUTYL ALCOHOL (SARA, CERCLA)	71-36-3	31.18 50	C,S	150CS	50 C,S	150 C,S	4.3	2.5	8000
POLYAMIDE ADDUCT RESIN	dna	<25	dna	dna	dna	dna	na	dna	dna
AMIDO AMINE RESIN	68443-08-3	<5	dna	dna	dna	dna	na	1.2	dna
TITANIUM DIOXIDE	13463-67-7	<5	dna	10	dna	10	na	24	6820
CARBON BLACK	1333-86-4	<5	dna	3.5	dna	3.5	na	dna	dna
XYLENE (SARA)	1330-20-7	1.31	100	435	100	435	6.6	4.3	6700

\*\* CALIF. TITLE 26: 22-12000 (PROP 65)

Contains toxic chemical subject to reporting requirements of SARA and CERCLA (40CFR 302,355,372)

SECTION 3 -- PHYSICAL DATA

BOILING RANGE: 244-282 Deg. F VAPOR DENSITY: Heavier than air CORROSION RATE: n  
VOLATILE VOLUME X : 51 EVAPORATION RATE: Butyl acetate = 1 AUTOIGNITION: 650  
WT PER GAL: 10.5 LBS LOW: 0.50 HIGH: 0.80 DECOMPOSITION TEMP: na  
APPEARANCE: Liquid ODOR: Solvent pH: na  
SOLUBILITY IN WATER: na VOC, mixed: 335 g/l, 2.8 lbs/gal VISCOSITY: > 68 KU

SECTION 4 -- FIRE AND EXPLOSION DATA

FLAMMABILITY: OSHA: Flammable - 1C FLASH POINT: 99 F (SETA) LFS: 1330-20-7  
DOT: Flammable, 1991 49CFR LEL: 1.00 UEL: 11.20  
Paint UN1263 US Postal - nonshippable  
EXTINGUISHING MEDIA: foam, CO2, dry chemical.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Wear self-contained breathing apparatus. Closed containers may explode when exposed to extreme heat. Isolate from heat, electrical equipment, sparks and open flame. Vapors may spread long distances, cause flash fire or ignite explosively.

FIREFIGHTING PROCEDURES: Wear full protective equipment, self-contained breathing apparatus.

(C)=Ceiling; (S)=Skin; LD50=Oral, rat; LC50=Inhalation, rat; LFS=Lowest Flashing Solvent  
dna=data not available; na=not applicable; b=ppb

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- ☒ Add  
☐ Change  
☐ Delete

☐ VIOLATION  
☐ VIOLATION FOLLOW-UP

3/16/96  
 AM.H

DISTRIBUTION  
 White - Region/Local Program  
 Canary - Data Entry/Region  
 Pink - Investigator/Data Entry

2/21/96

# TNRCC INVESTIGATION/VIOLATION FORM

(Boldfaced items are required)

1 Account Number B 2 0118 v Account Name Hercules Marine Services Corp  
 Date of Investigation (as MMDDYY) 12 20 95 Off Hours: ☐ Yes ☒ No  
 Investigator Staffcode CEB Permit(s) \_\_\_\_\_  
 Primary Investigator Juriscode 120 Other Juriscode 1 \_\_\_\_\_ Other Juriscode 2 \_\_\_\_\_  
 Site Name/Location Hercules Marine Services Corp  
 Person Contacted/Phone Larry Ballinger

2 Investigation Number 068464A Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 • Investigation Type ANBT In-House Investigation: ☐ Yes ☒ No \*\*EPN \_\_\_\_\_  
 Comment NO VIOLATIONS were noted during SIP investigation

>>> FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY <<<

Date Test Conducted (as MMDDYY) \_\_\_\_\_ Date Report Received (as MMDDYY) \_\_\_\_\_  
 Analysis Review Results (C,N,U) \_\_\_\_\_ Permits(s) \_\_\_\_\_ Retest Required: ☐ Yes ☐ No

3 Investigation Number \_\_\_\_\_ Related Previous Investigation Number \_\_\_\_\_  
 Federal Program: ☐ Yes ☐ No NSPS: ☐ Yes ☐ No NESHAP: ☐ Yes ☐ No Situation Number \_\_\_\_\_  
 (COMPLIANCE DIV. ONLY)  
 • Investigation Type \_\_\_\_\_ In-House Investigation: ☐ Yes ☐ No \*\*EPN \_\_\_\_\_  
 Comment \_\_\_\_\_

4 Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 • FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

4 Investigation Number \_\_\_\_\_ Local Ordinance: ☐ Yes ☐ No  
 Violation Number \_\_\_\_\_ (changes/deletes only) Situation Number \_\_\_\_\_ (Compliance Div. only)  
 Cause/Description \_\_\_\_\_ (Compliance Div. only)  
 Rule Violated \_\_\_\_\_ Contamcode \_\_\_\_\_  
 Fill in the following applicable items:  
 Permit Number \_\_\_\_\_ Permit Provision \_\_\_\_\_  
 Board Order Number \_\_\_\_\_ Court Order Number \_\_\_\_\_ CFR Part \_\_\_\_\_  
 • FIN Involved \_\_\_\_\_ Facility Name (optional) \_\_\_\_\_  
 Violation Type: ☐ Clerical ☐ Non-Clerical ☐ Imminent Danger Date NOV Sent (as MMDDYY) \_\_\_\_\_  
 Date NOV Received (as MMDDYY) \_\_\_\_\_ (defaults to 5 days after date NOV sent)

RECEIVED

MAR 11 1996

NOV SECTION  
 ENFORCEMENT DIVISION

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- See back for valid codes and investigation type codes matrix
- \*\* EPN required for investigation types indicated on back with an \*
- \* FIN required for VOC violations as indicated with a + in the user's manual rule table

Investigator signature Candace C. Bantux  
 Approved by [Signature]

Date 2-15-96  
 Date 2-16-96